

(www.dcisc.org)

http://www.slo-span.org/local_webcast/DCISC/stream_index.htm and through <http://www.dcisc.org>.

* * * * *

Point San Luis Conference Room
First & San Francisco Streets
Avila Beach, California

- A. Public Outreach, Site Visits and Other Committee Activities; Agenda Items, Scheduling and Confirmation of Future Fact-findings and Public Meetings.
- B. Documents Provided to the Committee.

VII TECHNICAL CONSULTANT & LEGAL COUNSEL REPORT; RECEIVE, APPROVE AND AUTHORIZE TRANSMITTAL OF FACT-FINDING REPORT TO PG&E

- A. Consultant R. Ferman Wardell:
Fact-finding Topics; Report on and Approval of November 6-7, 2019 Fact Finding Report.
- B. Robert Rathie:
Administrative, Regulatory and Legal Matters.

VIII ADJOURN MORNING MEETING

Afternoon Session – 2/12/2020 - 1:30 P.M.

IX RECONVENE FOR AFTERNOON MEETING

X COMMITTEE MEMBER COMMENTS

XI PUBLIC COMMENTS AND COMMUNICATIONS

Anyone wishing to address the Committee on matters not appearing on the Agenda may do so only at this time. The public may comment on any matter listed on the Agenda immediately following the time the matter is considered by the Committee. *There may be a time limit established by the Presiding Officer for each speaker. No action will be taken by the Committee on matters brought up under this item but they may be referred to staff for further study, response or action.*

XII ACTION ITEM (Cont'd.)

Discussion/Approval

- D. Discussion of Possible Alternatives for Amending the DCISC's Restated Charter presented by a Proposed Settlement Agreement in the California Public Utilities Commission 2018 Nuclear Decommissioning Cost Triennial Proceedings; Approval of Submission of an Application and/or Other Communication to the California Public Utilities Commission Regarding a Second Restatement of the DCISC Charter to Provide for a Continued Role, following DCP's Cessation of Electricity Generating Operations, for the DCISC to Review Nuclear Fuel-Related Issues and to Terminate that Review Upon Completion of the Safe Transfer of all Nuclear Fuel to the Independent Spent Fuel Storage Installation.

XIII TECHNICAL CONSULTANT REPORT & RECEIVE, APPROVE AND AUTHORIZE TRANSMITTAL OF FACT-FINDING REPORT TO PG&E (Cont'd.)

- B. Consultant R. Ferman Wardell:
Revise re Approval of July 22-23, 2019 Fact Finding Report
- C. Consultant Richard D. McWhorter Jr:
Fact-finding Topics; Report on and Approval of the December 10-11, 2019 Fact Finding Report.

XIV INFORMATION ITEMS BEFORE THE COMMITTEE

- A. Informational Presentations Requested by the Committee of PG&E Representatives:
 - (1) State of the Plant Update including Key Events, Highlights, Organizational Changes, Update on PG&E Bankruptcy and any effect on Current and Future Operations, and Station Activities since DCISC's October 2019 Public Meeting.
 - (2) Performance During the 21st Refueling Outage for Unit 2 (2R21) including Generator Stator Refurbishment, Key Activities, Performance Indicators, Results Achieved, Fuel and Steam Generator Inspection Results, Unexpected Equipment Issues and Open Items.

XV ADJOURN AFTERNOON MEETING

Evening Session – 2/12/2020 - 5:30 P.M.

XVI RECONVENE FOR EVENING MEETING

XVII COMMITTEE MEMBER COMMENTS

XVIII PUBLIC COMMENTS AND COMMUNICATIONS

Anyone wishing to address the Committee on matters not appearing on the Agenda may do so only at this time. The public may comment on any matter listed on the Agenda immediately following the time the matter is considered by the Committee. *There may be a time limit for each speaker as designated by the presiding officer. No action will be taken by the Committee on matters brought up under this item but they may be referred to staff for further study, response or action.*

XIX INFORMATION ITEMS BEFORE THE COMMITTEE (Cont'd.)

- B. Informational Presentations Requested by the Committee:
 - (3) Presentation by the Emergency Services Manager for the San Luis Obispo County Office of Emergency Services on Emergency Preparedness Programs.
 - (4) Presentation by PG&E on the Quality Verification Organization's Perspective on Plant Performance, Quality Verification's Top Issues, and the Latest Quality Performance Assessment Report

XX ADJOURN EVENING MEETING

Morning Session - 2/13/2020 - 9:00 A.M.

XXI RECONVENE FOR MORNING MEETING

XXII COMMITTEE MEMBER COMMENTS

XXIII PUBLIC COMMENTS AND COMMUNICATIONS

Anyone wishing to address the Committee on matters not appearing on the Agenda may do so only at this time. The public may comment on any matter listed on the Agenda immediately following the time the matter is considered by the Committee. *There will be a time limit established by the Presiding Officer for each speaker. No action will be taken by the Committee on matters brought up under this item but they may be referred to staff for further study, response or action.*

XXIV INFORMATION ITEMS BEFORE THE COMMITTEE (Cont'd.)

- C. Informational Presentations Requested by the Committee of PG&E Representatives:
- 5) Update on the Status of NRC Performance Indicators, Licensee Event Reports, NRC Inspection Reports and Notices of Violation, Issues Raised by NRC Resident Inspectors, Open Compliance Issues and License Action Requests.
- 6) Results of the 2019 Operating Plan and Key Elements of the 2020 Operating Plan.

XXV TECHNICAL CONSULTANT REPORT & RECEIVE, APPROVE AND AUTHORIZE TRANSMITTAL OF FACT-FINDING REPORTS TO PG&E (Cont'd.)

- D. Consultant R. Ferman Wardell:
Fact-finding Topics; Report on and Approval of the
January 29-30, 2020 Fact Finding Report.

XXVI ADJOURN MORNING MEETING

Afternoon Session – 2/13/2019 - 1:30 P.M.

XXVII RECONVENE FOR AFTERNOON MEETING

XXVIII COMMITTEE MEMBER COMMENTS

XXIX PUBLIC COMMENTS AND COMMUNICATIONS

Anyone wishing to address the Committee on matters not appearing on the Agenda may do so now. The public may comment on any matter listed on the Agenda at the time the matter is being considered by the Committee. *There will be a time limit established by the Presiding Officer for each speaker. No action will be taken by the Committee on matters brought up under this item but they may be referred to staff for further study, response or action.*

XXX INFORMATION ITEMS BEFORE THE COMMITTEE (Cont'd.)

- D. Informational Presentations Requested by the Committee of PG&E Representatives:
- 7) Current Status of Programs that Monitor Human Performance - Human Performance Indicators and Trends in Human Performance (including Personnel Error, Mispositioning, Station and Department Level Events and Safety Incidents).

XXXI CONCLUDING REMARKS &
DISCUSSION BY COMMITTEE MEMBERS
OF FUTURE DCISC ACTIVITIES

- A. Future Actions by the Committee.
- B. Further Information to Obtain/Review.
- C. Scheduling of Future Site Visits,
Study Sessions and Meetings.

XXXIV ADJOURNMENT OF NINETY-FIFTH PUBLIC MEETING

The DCISC's policy is to schedule its public meetings in locations that are accessible to people with disabilities. The Avila Lighthouse Suites Point San Luis Conference Facility is a wheelchair accessible facility. A person who needs a disability-related accommodation or modification in order to participate in the meeting may make a request by contacting the DCISC office at (800) 439-4688 or by sending a written request to the DCISC office at 857 Cass Street, Ste. D., Monterey, CA 93940. Providing your request at least five business days before the meeting will help ensure availability of the requested accommodation.

DIABLO CANYON INDEPENDENT SAFETY COMMITTEE**AGENDA TRANSMITTAL FORM****MEETING DATE:**

February 12, 2020

AGENDA ITEM:

IV-A

AGENDA TITLE:Minutes of October 23-24, 2019,
Public Meeting**CONSENT [X]****ACTION []****INFORMATION []**

Staff Summary: Attached are the Minutes which have been prepared from the Committee's ninety-fourth public meeting held on October 23-24, 2019 in Avila Beach, CA.

(Each session was webcast live in real time and is available for subsequent viewing, archived to the meeting agenda, by visiting the links on the Committee's website at www.disc.org or at www.slospan.org. Meetings are videotaped for later broadcast on Channel 21 in the San Luis Obispo, CA area, the governmental access television channel.)

RECOMMENDED COMMITTEE ACTION: Accept the Minutes by motion

AGENDA PACKET DRAFT - JANUARY 29, 2019

MINUTES
of the
DIABLO CANYON INDEPENDENT SAFETY COMMITTEE'S
OCTOBER 23-24, 2019 PUBLIC MEETING
[For approval at the February 12-13, 2020 Public Meeting.]

Wednesday & Thursday
October 23-24, 2019
Avila Beach, California

Notice of Meeting

A legal notice of the public meeting and several display advertisements were published in local newspapers and mailed to the media and those persons on the Committee's service list. A copy of the meeting agenda was posted on the Committee's website at www.dcisc.org.

Agenda

I CALL TO ORDER - ROLL CALL

The October 23, 2019, public meeting of the Diablo Canyon Independent Safety Committee (DCISC) the ninety-fourth public meeting of the Committee was called to order by Committee Chair Dr. Peter Lam at 9:00 A.M. in the Point San Luis Conference Room at the Avila Lighthouse Suites in Avila Beach, California. Dr. Lam welcomed the members of the public in attendance. The public meetings of the Committee may be viewed in livestreaming video at www.dcisc.org and www.slospan.org and are videotaped for broadcast later on the local public access television station. Dr. Lam introduced himself as the appointee of the California Energy Commission and the current serving DCISC Chair and he briefly reviewed the professional backgrounds and appointment to the DCISC for each of the other DCISC Members, Dr. Robert J. Budnitz, the appointee of the California Attorney General, and Dr. Per F. Peterson, the appointee of the Governor of California.

Present: Committee Member Robert J. Budnitz
Committee Member Peter Lam
Committee Member Per F. Peterson
Absent: None

II INTRODUCTIONS

Dr. Lam introduced the Committee's Technical Consultants Mr. Richard D. McWhorter, Jr. and Mr. R. Ferman Wardell and DCISC Assistant Legal Counsel Mr. Robert W. Rathie. Dr. Lam then introduced Mr. Tom Baldwin, the Director of Business Operations for the Diablo Canyon Power Plant (DCPP), and Mr. Hector Garcia, Support Manager to the DCPP Chief Nuclear Officer and who also acts as the principal liaison with the DCISC. Dr. Lam remarked Mr. Baldwin and Mr. Garcia play key roles on behalf of PG&E in working with the DCISC in coordinating its activities, providing information and facilitating its public meetings and the

AGENDA PACKET DRAFT - JANUARY 29, 2019

frequent fact-finding visits to the plant conducted by a DCISC member and a technical consultant.

III PUBLIC COMMENTS AND COMMUNICATIONS

The Chair invited any members of the public present who wished to address remarks to the Committee on items not appearing on the agenda for the public meeting to do so at this time and he briefly reviewed the advice from the agenda concerning items or issues which are brought to the attention of the DCISC by the public during its public meetings. There was no response to this invitation.

IV CONSENT AGENDA

The only item on the Consent Agenda was approval of the Minutes of the Committee's June 4-5, 2019, public meeting held in Avila Beach, California. A draft of the June 2019 Minutes was included in the public agenda packet. The members and consultants reviewed the Minutes and provided corrections and substantive changes to certain references which will be included in the final version of the June 2019 Minutes. During their discussion members received information concerning references in the Minutes from Mr. David Weisman, representing the Alliance for Nuclear Responsibility and from Ms. Jill ZamEk representing the San Luis Obispo Mothers for Peace and members and consultants reviewed some of the actions identified to follow-up on items discussed at the June 2019 public meeting and they provided clarification concerning typographical errors and the accuracy of certain references in the Minutes and made editorial comments and changes concerning the draft of the June 2019 Minutes.

The Minutes of the Committee's public meetings, in their final accepted form, become part of the Committee's annual reports on safety of DCPD operations (Annual Report). On a motion by Dr. Budnitz, seconded by Dr. Peterson, the Minutes of the Committee's June 2019 public meeting were unanimously accepted subject to inclusion of the changes provided to the Committee's Assistant Legal Counsel. The June 2019 Minutes will become a part of the Committee's 29th Annual Report.

V ACTION ITEMS

A. DCISC's 29th Annual Report on Safety of Diablo Canyon Operations; July 1, 2018 - June 30, 2019.

The Chair requested Consultant Wardell to lead the discussion concerning preparation of the 29th Annual Report on the Safety of Diablo Canyon Nuclear Power Plant Operations. Mr. Wardell reported three drafts of the report were circulated for review and a draft of the Executive Summary was provided for final review and as the basis for discussion regarding approval of the Annual Report. Dr. Budnitz commended Consultants Wardell and McWhorter for an excellent job in preparing the report and he reported the Committee includes in its Annual Reports its overall and specific Conclusions and its Concerns as well as, on occasion, any Recommendations to PG&E regarding safety of operations. In response to Dr. Lam's request Mr. Wardell stated

AGENDA PACKET DRAFT - JANUARY 29, 2019

that Recommendations are usually identified as part of a Committee fact-finding report and the Recommendation goes through a review process before a decision is made to include a Recommendation in an Annual Report. By the decision which created the DCISC and directed preparation of its Annual Reports, PG&E provides a response to every DCISC Annual Report including a substantive response to each Recommendation made in an Annual Report but PG&E is not required in this response to address Committee Concerns or Conclusions. Dr. Budnitz briefly reviewed the distinction between a Concern wherein attention is called to some issue, and a Recommendation wherein an action is recommended and he confirmed Dr. Lam's observation that this difference does not diminish the significance of a Concern with respect to a Recommendation.

Dr. Lam reported during the California Public Utilities Commission (CPUC) public informational and participation hearings held in the 2018 Nuclear Decommissioning Triennial Cost Proceedings (NDCTP) on August 7-8, 2019 in San Luis Obispo a comment was made by Mr. Alex Karlin, a member of PG&E's Diablo Canyon Community Engagement Panel (DC CEP) who was at that time speaking as an individual, that for the past 28 years the DCISC has issued basically the same Annual Report. Dr. Lam stated during his ten years of service on the DCISC he has found the Committee's Annual Reports to be not only relevant but material in advancing the Committee's safety agenda and the Committee has found each of PG&E's responses to its recommendations to be satisfactory. Dr. Peterson concurred with Dr. Budnitz and remarked that the Open Items List maintained by the Committee and the public meetings it holds in the local community provide convenient and transparent venues for Mr. Karlin or any interested member of the public to provide input and to learn about the matters currently under its review. Dr. Budnitz stated that if Mr. Karlin were to express his opinion that the DCISC has essentially no or very little value this broader conclusion would not require specifics and while Dr. Budnitz stated might disagree he could respect such an opinion.

Dr. Peterson remarked the Committee is the only such body of its kind and was founded based upon a policy decision by the State of California acting thorough the CPUC and the question of whether the DCISC is to have any review role post-cessation of DCPD electricity generation operations is a similar policy question. Dr. Budnitz opined that the unique role fulfilled by the DCISC would be unlikely to be able to be assumed by any other state body or bodies. Dr. Lam expressed the consensus of the Committee that the Committee's Annual Reports are well constructed, material and relevant in advancing the Committee safety review role. Mr. Rathie remarked that when the Committee distributes its Annual Report, feedback on the usefulness of the report is solicited by the cover letters sent with the report to the CPUC, the Energy Commission, the Attorney General and to the Governor. Dr. Budnitz reported he received positive feedback from the Attorney General's representatives when he met with them in January of this year.

The DCISC's Annual Reports are made available in two bound volumes, as a compact disk, on a usb thumb drive and on the Committee's website at www.dcisc.org. The Annual Report is made available to the public and sent to the CPUC and the entities appointing members of the DCISC and to other interested parties and provided for inclusion in the collections of the California Polytechnic University at San Luis Obispo (Cal Poly) R.E. Kennedy Library and local libraries in San Luis Obispo County.

AGENDA PACKET DRAFT - JANUARY 29, 2019

There being no public comment on the Annual Report, on a motion by Dr. Budnitz, seconded by Dr. Peterson, the Committee unanimously accepted its Twenty-Ninth Annual Report on the Safety of Diablo Canyon Operations for the period July 1, 2018 - June 30, 2019. **Mr. Rathie reported the 29th Annual Report will now be provided to PG&E for its review and response which will be incorporated into the final report and officially received by the Committee at its February 12-13, 2020 public meeting.**

B. Update on Financial Matters and Committee Activities 2019-2020.

In response to the Chair's request Assistant Legal Counsel Rathie stated that a report was provided showing the expenditures by the Committee to date by category and the grant funds received for the Committee's operations which are provided by PG&E's ratepayers in accordance with the CPUC Decision which continued the operation of the Committee. He reported the DCISC has received full funding for its operations during 2019 and should complete its activities during calendar year 2019 without exceeding the funds allocated for its operations and will likely once again be in a position to remit the unspent funds back to the ratepayers. Mr. Rathie directed the Members' attention to the agenda packet with the list of currently planned activities for the remainder of 2019 and for 2020.

C. Discussion of Issues on Open Items List.

Dr. Lam requested Consultant Wardell lead a review of items on the Open Items List, which he described as a very important tool used by the Committee to track and also to follow issues, concerns, and information requests identified for subsequent action or receipt during its fact-findings and public meetings.

Items discussed or concerning which action was taken included the following¹:

<u>Item</u>	<u>Re:</u>	<u>Action Taken</u>
CO-13	CAISO load following	Break into two items: (1) Grid stability and effect on DCPD and the SPS - Next Action 12/19FF (2) Offsite Periodic Power Curtailment-Next Action 4Q20
CM-7	Compliance with 10CFR50.55a ISI Containment & ASME Code re steel liner weld inspection	Next Action 11/19FF
CM-13	Maintenance Dept. Performance Measures	Next Action 1/20FF
HS-6	Safety Culture/SCWE	Next Action 1Q20FF
NS-5	NSOC Meetings- attend exit interviews	Next Action 1/20FF

¹ Key to some of the abbreviations used: Meeting (PM), Quarter (Q), Fact-finding (FF), , Dr. Robert J. Budnitz (RJB), Dr. Per F. Peterson (PFP), and Mr. R. Ferman Wardell (RFW), Mr. Richard D. McWhorter (RDM).

AGENDA PACKET DRAFT - JANUARY 29, 2019

SF-4	Create New Item re 6/19 PM Schumann comment re DCISC position & review of plans and timing for spent fuel transfer from SFP to ISFSI	Next Action 12/19FF
SC-3	Long Term Seismic Program/IPRP Meetings	Next Action 11/19 RJB
DEC-1	Decommissioning Plans - remove reference to spent fuel (re addition of SF-4)	Next Action 2Q20FF then 10/20PM
2/16PM-10	Potential Open Phase Condition - Installation of 4kV solid state relays	Next Action 2Q20
10/18PM-15	Clarification of Restated Charter	Close
2/19PM-3	B.5.b. spent fuel requirements	Include w/SF-4
6/19PM-3	Variable frequency drive motor	Next Action 12/19FF PFP

Certain items on the list and not discussed above were identified by Mr. Wardell for closure and were so approved. Mr. Wardell called the Committee's attention to Page 10 of the Open Items List which tracks the dates on which plant system and program reviews were completed or scheduled.

A short break followed the review of the Open Items List

VI COMMITTEE MEMBER REPORTS AND DISCUSSION

A. Public Outreach, Site Visits and Other Committee Activities:

The Members confirmed public meetings of the DCISC for February 12-13, June 24-25 [subsequently changed to July 1-2] with a tour of the power plant with members of the public at that meeting, September 30-October 1, 2020, and they then scheduled a public meeting for February 16-17, 2021.

Fact-finding visits were confirmed and scheduled as follows:

[2019] November 6-7 RJB/RFW; December 11-12, 2019 PFP/RDM;

[2020] January 29-30 PL/RFW; March 17-18 RJB/RDM; April 15-16 PL/RFW; May 12-13 PFP/RDM; July 14-15 PFP/RFW; August 19-20 PL/RDM; September 1-2 RJB/RFW; November 9-10 RJB/RDM; December 8-9, 2020 PFP/RFW; and

[2021] January 27-28, 2021 PL/RDM.

B. Documents Provided to the Committee:

The Chair observed that a list of documents received by the DCISC since its last public meeting in June 2019 was included in the public agenda packet for this meeting and the Committee strives to always conduct its business in a transparent fashion.

AGENDA PACKET DRAFT - JANUARY 29, 2019

VII STAFF-CONSULTANT REPORTS & RECEIVE, APPROVE AND AUTHORIZE TRANSMITTAL OF FACT FINDING REPORTS TO PG&E

The Chair requested Consultant McWhorter to report on the July 16-17, 2019, fact-finding visit with Dr. Peterson to DCP. He reviewed the topics discussed with PG&E during the July 16-17, 2019, visit as follows:

➤ Refueling Outage 1R21 Issues - Mr. McWhorter reported that in January 2019, prior to the 1R21 refueling outage, damage was found to Reactor Coolant Pump (RCP) 1-2 seals which resulted in the Reactor Coolant System (RCS) leak rate increasing on Unit-1 and replacement of the RCP seal was added to the scope of work for 1R21. A root cause analysis identified the damage as having been caused by over pressurization of the Reactor Coolant Drain Tank during draining of the Pressurizer Relief Tank which created back pressure/back flow on the RCP seals resulting in debris being swept into the seals. It was found that a previous root cause analysis performed in 2013 was inadequate in that analysis resulted in procedures being changed to deal with this scenario when the plant was shut down but procedures during operations had not been similarly revised. Mr. McWhorter reported the fact-finding team also reviewed the failure of the Containment Polar Crane during reactor head lift when a variable frequency drive motor tripped, leaving the reactor head suspended for six hours until the trip was reset. He reported the reactor head is designed to be seismically secure at all times even when it is suspended and although this event was undesirable it did not cause serious concern. The motor trip was related to a coupling which had caused similar previous trips since the Polar Crane motor was upgraded in 2012 and 2013. Replacement of this coupling had been planned and deferred several times and its replacement is now planned during 1R22. Mr. McWhorter reported the Maintenance technicians on duty during the night shift when the recent trip occurred did not have previous experience in how to quickly reset the trip. When Maintenance technicians on the day shift reported for duty they were able to quickly reset the trip. The DCISC representatives concluded both of these emergent issues during 1R21 were handled appropriately but both could have been avoided. **Mr. McWhorter reported a Recommendation was made in the Fact Finding Report that the Committee follow-up on the adequacy of root cause evaluations and the corrective actions taken for root causes identified.** Dr. Peterson confirmed, in response to a comment by Dr. Budnitz, that the NRC resident inspectors also reviewed the issue of the suspension of the reactor head and found the event's safety significance to be low. **Consultant Wardell commented the DCISC fact-finding visit scheduled in November 2019 will include following up on the Recommendation concerning root cause evaluations at DCP.**

➤ Annual Radiological Release Report and Annual Radiological Environmental Monitoring Report - Mr. McWhorter reported the Annual Radiological Release Report for calendar year 2018 examines all liquid and effluent releases from the station and compares them to the limits established by the plant's Technical Specifications (TS) and to radiation dose levels which are potentially harmful to the public. He reported all 2018 radioactive effluent releases were small fractions of these allowable TS limits and there was no direct offsite radiation exposure. Because of the large size of the area occupied by DCP, a surrogate calculation is performed for the radiation exposure a non radiation worker would receive who worked at the plant's water treatment facility, the facility with the highest exposure, full time for an entire year. That

AGENDA PACKET DRAFT - JANUARY 29, 2019

calculation found such a worker would have received approximately 4.7 milliRem additional dose over background dose due to effluent and gaseous releases by the plant in 2018. The second report, the Annual Radiological Environmental Monitoring Report measures radiation levels in the local area at 32 locations as well as testing water, vegetable, milk and meat samples. There was no radioactivity found in any samples above that occurring naturally. Mr. McWhorter reported the only noticeable amount of radiation released to the environment through the operation of DCPD in 2018 continued to be low levels of tritium found in the groundwater under the station due to rain washing the tritium out of the air and into the groundwater. This groundwater is typically swept in the Pacific Ocean. He reported tritium levels are below drinking water standards set the federal Environmental Protection Agency. Mr. McWhorter reported that the cumulative radiation dose for members of the public due to DCPD operation is less than 1 milliRem.

➤ Training Program for Temporary Outage Workers - Mr. McWhorter reported that approximately 1,500 temporary workers are brought on to the site for a typical refueling outage and are processed for fitness for duty, background and psychological evaluations, work history, etc., over several weeks at a rate of 75-100 individuals per day. Training is provided to ensure these workers can perform to the nuclear and industrial safety standards established for work at the station. Temporary workers then meet with representatives of the various departments in which they will be working and based upon each worker's history a site-specific and generic training plan and schedule is created which also employs computer based training for each temporary worker and temporary supervisor. The DCISC representatives also reviewed worker training for foreign material exclusion (FME) which is provided to all temporary workers. FME is intended to keep foreign material out of open systems such as the RCS and specific FME training is provided to workers assigned responsibilities for such types of work. The DCISC representatives concluded the training program for temporary workers appeared to be extensive and rigorous and the FME-specific training was adequate.

➤ Individual Radiation Exposure During Outages - Mr. McWhorter reported a question was raised at the DCISC June 2019 public meeting about radiation dose received during 1R21 for an individual worker. Mr. McWhorter reported the outage dose goal is established based upon the expected dose for each separate work package for the outage and is adjusted in accordance with As Low As Reasonably Achievable (ALARA) principles by the ALARA Review Committee and then further adjusted to create a challenge goal. During 1R21 the challenge goal set was 29 Person-Rem and 30.2 Person-Rem was accumulated during 1R21 which exceeded the ALARA and the challenge goals but was less than the total exposure expected based upon the sum of the work packages undertaken during 1R21. Exceeding the ALARA and challenge goals was found to be due to emergent work and equipment malfunctions which caused the outage duration to be extended. Mr. McWhorter reported the station uses techniques such as video monitoring workers when they are working in high dose areas such as the reactor cavity and having dosimetry on each individual that is monitored in real-time. He reported the highest dose received by any single individual was 355 milliRem which he stated compares favorably to the 300-400 milliRem any individual would be expected to receive if traveling across the country by

AGENDA PACKET DRAFT - JANUARY 29, 2019

air. During 1R21, three workers received more than 300 milliRem, twelve workers received more than 200 milliRem, seven workers received more than 100 milliRem and 625 workers who entered radiologically controlled areas (RCA) during 1R21 had zero radiation exposure while 862 workers had more than zero but less than 100 milliRem. Mr. McWhorter reported 1,487 workers made a total of 34,000 entries into the RCAs during 1R21. The DCISC representatives concluded the dose to individuals during DCPD refueling outages is being effectively managed and limited to very low levels.

- Meet with DCPD Officer - the DCISC representatives met with PG&E Senior Vice President, Generation, and Chief Nuclear Officer Mr. Jim Welsch to discuss recently announced organizational changes.
- Recent Modifications to Reactor Coolant Pump (RCP) Vibration Monitoring Systems - Mr. McWhorter reported this system monitors the four RCPs on each unit for any sudden increases in vibration and to provide real time data and historical data on RCP vibration. He reported the RCP Vibration Monitoring System has certain limitations on the amount of data it is capable of retaining and changes were initiated to upgrade the system in three phases: Phase 1 to upgrade the digital systems outside of Containment, that is, the computer in the Control Room; Phase 2 to replace equipment racks inside Containment which was accomplished for Unit-1 during 1R21, however, problems were experienced upon restart when communication stopped at times and required cards to be reset or power to be cycled to the rack to restore communication which Mr. McWhorter reported is still being investigated concerning electrical noise on older sensors; and Phase 3 which will include similar replacements for Unit-2 but has been deferred until the problems related to Phase 1 and 2 on Unit-1 have been resolved. The fact-finding team concluded this was an excellent initiative to improve the RCP Vibration Monitoring System.
- Safety/Security Interface Program - Mr. McWhorter reported this program monitors changes to security equipment to ensure the changes do not affect operations and conversely reviews changes to operations to ensure security is not affected. The DCISC team's routine review found no major issues with either process and Mr. McWhorter reported modifications appear to be properly screened. The team also reviewed recent changes to the vehicle inspection station and changes planned for security at the Intake Structure. The DCISC team's conclusion was the program appears to be effectively managed.
- Meet with NRC Resident Inspector - The DCISC representatives met with NRC Resident Inspector Mr. John Reynoso to discuss items of interest to both resident inspectors. Mr. McWhorter reported the NRC is continuing its initiative to reduce the scope of its baseline inspection activities and accordingly the burden on plant licensees and the DCISC representatives discussed the result of the first quarter 2019 inspections. The NRC inspectors discussed their concern about an increase in the numbers of items of low level significance now occurring at DCPD which the inspectors are continuing to monitor at the station.

AGENDA PACKET DRAFT - JANUARY 29, 2019

➤ Buried Tanks and Piping Program - Mr. McWhorter reported this program monitors the structural integrity and leakage of buried piping and tanks. The program is based on Nuclear Energy Institute (NEI) guidance and is risk informed, in that more emphasis is placed on safety related systems' piping and those tanks containing radioactive or environmentally hazardous material. Mr. McWhorter reported DCPD has a smaller number of such systems and facilities as compared to some other nuclear stations but the program continues to monitor the Auxiliary Saltwater System (ASW) and the liquid radiation waste and the diesel fuel oil facilities. He reported the program health is in White² status due to having a new program engineer assigned, although the former program owner remains available to assist as needed. Mr. McWhorter reported the program is managed by an Asset Management Plan which determines what tanks and piping are to be inspected and how often and the Asset Management Plan is presently under revision as many of the activities in the plan were related to DCPD license renewal efforts which have now been cancelled. New insights from recent inspections and probabilistic risk assessment (PRA) are also being incorporated in the Asset Management Plan which is now expected to take the Buried Tanks and Piping Program out to plant shutdown in 2025. Mr. McWhorter reported the revisions to Asset Management Plan for the Buried Tanks and Piping Program should be approved and issued by the end of 2019 or in early 2020. **The DCISC team concluded the Buried Tanks and Piping Program appears to be effectively implemented but the Committee should review the new program sometime in the first half of 2020 to assess the results of the new Asset Management Plan.**

➤ Systems Engineering Department Update - Mr. McWhorter reported the NEI initiated a focus on ongoing organizational changes to and restructuring of system engineering departments to changes the system engineer's focus from tactical day-to-day operations and to make the system engineer's function more strategic and long-range focused. Tactical system functions are to be transferred to the Component Engineering organization and the Engineering Fix-It-Now (EFIN) teams will have responsibility for short term, day-to-day, system issues. Mr. McWhorter reported this is a three-year transition effort which commenced in 2018 and is scheduled to complete in 2020. Systems are to be grouped into tiers with Tier 1 systems being those important to nuclear safety and plant reliability; Tier 2 systems are systems important to nuclear safety and plant reliability and risk, but which do not meet Tier 1 criteria; and Tier 3 systems are systems that do not meet criteria for either Tier 1 or Tier 2. He reported system health reports will only be required and reviewed by the Plant Health Committee under the new program changes for Tier 1 systems. For Tier 3 systems, the system engineer will serve only as a point of contact and active long-range planning or design changes will not be pursued for Tier 3 systems. The Plant Health Committee will continue its recent focus on emergent issues and operator workarounds. **The DCISC team found the System Engineering Department to be effective**

² On a scale of Green indicating a healthy performance and White indicating that achievable action plans are in place to return performance to healthy status. A Yellow rating would indicate the indicator shows deficient performance and needs improvement and Red would indicate unsatisfactory performance.

AGENDA PACKET DRAFT - JANUARY 29, 2019

in managing the health of plant systems but the Department is undergoing significant organizational changes and Mr. McWhorter recommended the DCISC review the System Engineering Department again in late 2020.

Following Mr. McWhorter's report, Ms. Jill ZamEk, a member of the group San Luis Obispo Mothers for Peace was recognized. Ms. ZamEk stated Mothers for Peace remains concerned about DCP's ability to retain qualified employees and has concerns that maintenance activities are being delayed due to the pending closure of DCP. She commented on Mr. McWhorter's report that certain activities have been repeatedly deferred and on the instance Mr. McWhorter identified when a problem occurred and there was no one immediately available to repair a failed component. She stated Mr. McWhorter's comment on the increase in low level significant items was also of concern. Mr. McWhorter stated he shared Ms. ZamEk's concerns and the issue with the repair of the Polar Crane coupling represented a knowledge transfer issue. He commented that deferral of the repair was part of regular outage scope review cycles which failed to recognize the significance of the issue as a recurring problem.

Ms. Sherry Lewis, a member of Mothers for Peace was recognized. Mr. Lewis inquired why the night shift Maintenance technicians did not call on other technicians for assistance with the problem of resetting the trip of the Containment Polar Crane rather than waiting until the day shift came on duty. Mr. Garcia reported the night shift Maintenance technicians were engaged in troubleshooting the problem and were not simply waiting for support from the day shift. Ms. Lewis stated that it is a fact that no one knows the cause of the next accident and this fact motivates her opposition to nuclear power in general due to the potentially devastating results of accidents. She inquired regarding the comments made during Mr. McWhorter's comments on the NRC seeking to reduce the burden on its licensees by reducing its baseline inspection activities. Mr. McWhorter replied the NRC has assessed the benefits and the burdens of some of its activities and has found some to have little benefit to the licensees or to the NRC but in that assessment the objective was not to simply reduce the burden of inspection activities on licensees. Dr. Peterson stated it was important that the regulator not generate a false sense of confidence through its activities and this was the experience in Japan in assessing the frequency of a large tsunami although the Japanese at the time had very burdensome requirements such as conducting a refueling outage every twelve months were extremely expensive and provided virtually no safety benefit and generated a false sense of confidence and complacency. Dr. Peterson remarked it is good regulatory practice and equally important to determine what one should be looking at as it is to assess the things one does not need to rigorously review so as to focus upon asking the correct questions. Dr. Peterson remarked this extends to the public perception that reporting a large number of problems is indicative of serious issues. He stated it is important that all problems get reported no matter their significance so that important issues do not go unreported or that persons reporting problems do not risk detrimental effects by doing so which is corrosive to a healthy safety culture. Dr. Budnitz stated that the term "undue burden" was first articulated by the U.S. Congress and it has become embedded in NRC policies and one must therefore ask how much burden is due and in context of NRC inspection activities this judgment is principally exercised by the NRC resident inspectors assigned to each station but

AGENDA PACKET DRAFT - JANUARY 29, 2019

also involves the NRC staff in Washington, D.C. and the present emphasis on having fewer regulations is reflected in the conflict about what the words “undue burden” mean.

Mr. Tom Marre, a resident of Avila Beach was recognized. Mr. Marre stated that there is a problem with nukes and the envelope of air is very small and problems such as with the delayed suspension of the reactor head are representative of such problems.

Upon a motion made by Dr. Budnitz, seconded by Dr. Lam, the July 23-24, 2019 Fact Finding Report was accepted by the DCISC and its transmittal to PG&E was authorized. The report will become a part of the Committee’s 30th Annual Report.

The Chair requested Assistant Legal Counsel Rathie to report on administrative, regulatory and legal matters.

Mr. Rathie reported that congratulations are in order to Dr. Budnitz for his recent reappointment by the California Attorney General to a term on the Committee to run through 2022. He reported that all DCISC Members are now serving within appointed terms and the next appointment will be that by the Governor of California. Mr. Rathie reported the informational video produced by the Committee is now available on the Committee’s website at www.dcisc.org. He then reported that the Committee’s Motion for party status in the 2018 Nuclear Decommissioning Cost Triennial Proceedings (NDCTP) was denied by the then assigned Administrative Law Judge on the day following the Committee’s June 2019 public meeting and there is a discussion scheduled later during this public meeting on the issue of a post-shutdown role for the DCISC. Despite having been denied party status in the NDCTP, the Committee was invited to make a short presentation during the public participation and informational hearings held on August 7-8, 2019 in San Luis Obispo and Mr. Rathie reported that he attended both hearings and made short presentations of the Committee’s history, its role and on the current membership of the Committee. As a new administrative law judge has been assigned to the NDCTP it is not anticipated that a decision in those proceedings will be forthcoming before February or March 2020.

VIII ADJOURN MORNING MEETING

The Chair adjourned the morning meeting of the DCISC at 12:20 P.M.

IX RECONVENE FOR AFTERNOON MEETING

The afternoon meeting of the DCISC was convened by the Chair at 1:30 P.M.

X COMMITTEE MEMBER COMMENTS

There were no comments from any Members at this time.

AGENDA PACKET DRAFT - JANUARY 29, 2019

XI PUBLIC COMMENTS AND COMMUNICATIONS

Dr. Lam invited members of the public to address the Committee on matters not on the agenda for this meeting. There was no response to this invitation

XII INFORMATION ITEMS BEFORE THE COMMITTEE

The Chair requested DCPD Director of Business Operations Mr. Tom Baldwin to introduce the first of the informational presentations for this public meeting. Mr. Baldwin introduced Mr. Adam Peck, Senior Director of the Engineering, Technical and Emergency Services at DCPD. Mr. Baldwin reported Mr. Peck is a graduate of the U.S. Naval Academy and a former nuclear U.S. Navy officer. Mr. Peck holds a Senior Reactor Operator License and has led the Control Room staff as Director of Operations as well as having previously served as DCPD Director of Engineering and of Operations.

Presentation on the State of the Plant including Key Events, Highlights, Organizational Changes and Station Activities since the DCISC's June 2019 Public Meeting.

Mr. Peck stated he would be reviewing plant operation and performance since the last public meeting of the DCISC in June 2019 and would be providing information to the Committee on the 2R21 refueling outage. He reported that Unit-1 is safely operating at 100 percent power with all NRC Performance Indicators in Green status. Unit-2 is currently shut down as part of a planned refueling outage (2R21). He stated that in the last quarter of 2019 DCPD supported a Peer Review and an Annual Evaluation, both conducted by the World Association of Nuclear Power Operators (WANO), as well as a Fire and Emergency Planning Inspection and Operations Crew Performance Evaluation conducted by the Institute for Nuclear Power Operations (INPO). Mr. Peck reported that DCPD has retained its INPO One rating.

Mr. Peck reported 2R21 commenced on September 22, 2019, and he reviewed the daily load profile for both units for the past four months. He then reviewed the daily load profile for both units for the last twelve months. He reported power was curtailed on Unit-1 in August 2019 for planned testing.

Mr. Peck stated 2R21 is a long-duration refueling outage of approximately 85 days and he reviewed and discussed work planned during 2R21 as follows:

- Generator Stator Rewind Project - the in-place stator rewind which is driving the outage duration.
- Diesel Generator 2-1 Maintenance – a major maintenance overhaul and governor upgrade on Emergency Diesel Generator (EDG) 2-1.
- Reactor Coolant Pump 2-3 Maintenance - rotor and stator replacement.
- Circulating Water Pump 2-1 Maintenance.

AGENDA PACKET DRAFT - JANUARY 29, 2019

- Steam Generator Sludge Lancing and Eddy Current Testing for All Four Unit-2 Steam Generators (SGs) - secondary side sludge lancing and eddy current testing. Mr. Peck reported DCPD was assisted by Westinghouse and good results were achieved with no tubes having required plugging. Approximately ten pounds of sludge was removed in total. Mr. Peck stated these results demonstrate effective chemistry controls on the SGs and the SGs are being well maintained.
- Containment Fan Cooler Unit 2-5 Cooling Coil Replacement - involving a significant amount of welding inside Containment.
- Main Bank Transformer Oil Pumps and Bladder Replacement - to maintain reliability.
- Vital Bus “G” Maintenance.

In response to Dr. Lam’s inquiry, Mr. Peck confirmed the typical operational life for a commercial generator stator is 30-35 years and the Unit-2 stator being rewound during 2R21 is the original stator and is now 35 years old. He described the stator rewind as a significant project which demonstrates DCPD’s commitment to supporting safe operation and excellence through the plant’s operational lifetime and he stated the risks of not undertaking the project could result in an extended shutdown. Mr. Peck, in his response to Dr. Budnitz, confirmed the stator work has gone well and the Siemens firm’s team is performing very well. In response to Consultant Wardell’s inquiry Mr. Peck replied the open phase modification was installed in September 2019 prior to 2R21 but these modifications to enhance reliability of power supplies have presented challenges and the system is now operating in monitoring only mode.

Mr. Peck reviewed upcoming station activities including DCPD supporting the INPO Accreditation Renewal Pilot Project for the plant’s Operations, Maintenance, and Technical Programs in November and the NRC Heat Sink Performance Inspection in December 2019. In response to Consultant McWhorter’s inquiry Mr. Peck stated there were no issues experienced during 2R21 with core offload and during core loading a frayed cable was identified on the up-ender, the device used to transfer fuel from a vertical to horizontal position to go through the transfer tube to and from the spent fuel pool. He stated this work required use of a nuclear diver and was a unique evolution.

Dr. Lam thanked Mr. Peck for his presentation.

Mr. Baldwin introduced Mr. Shane Guess, Manager of Nuclear Business Operations at DCPD, and reported Mr. Guess has been licensed as a Senior Reactor Operator and holds a Bachelor of Science Degree in Nuclear Engineering from the University of California at Berkeley and a Master’s Degree in Business. Mr. Baldwin reported Mr. Guess also has experience in the Operations organization as Operations Department Manager as well as in the Training, Reactor Engineering and Licensing organizations at DCPD.

AGENDA PACKET DRAFT - JANUARY 29, 2019

Plans for Future Staffing through the Cessation of Operations including Current Staffing Numbers and Trends, Recruitment of New Employees, Results of the Tranche 2 Retention Agreement Enrollment and Future Professional Development Opportunities.

Mr. Guess stated his role in Nuclear Business Operations involves workforce planning for DCPD departments to ensure safe and reliable operations through the end of the current operating licenses from the NRC for both units. Mr. Guess provided background on the Joint Proposal entered into by PG&E together with Friends of the Earth, the Natural Resources Defense Council, Environment California, the International Brotherhood of Electrical Workers Local 1245, Coalition of California Utility Employees and the Alliance for Nuclear Responsibility (Joint Proposal) in June 2016 to retire DCPD at the expiration of the current operating licenses for each unit, that is November 2024 for Unit-1 and August 2025 for Unit-2. He also reviewed the effect of California Senate Bill 1090 (SB1090) and he reported that the Joint Proposal and SB1090 established a framework for staffing the plant until the end of the operating licenses. In accordance, PG&E has developed the Employee Retention Program. He stated Tier 1 of that program commenced in 2016 and included a four-year period where retention bonuses were offered to employees. Tier 2 commences immediately following Tier 1, beginning on September 1, 2020, and Tier 2 continues for an additional three-year period. Following the conclusion of Tier 2 PG&E intends to rely upon severance packages offered to plant staff in order to retain necessary personnel. Mr. Guess stated the nine-year lead time prior to plant closure, from 2016 to 2025, provides better opportunity for workforce planning than has been afforded to other nuclear power plants faced with closure.

Mr. Guess providing a list of the various Departments at DCPD including:

- Operations
- Maintenance
- Security
- Engineering
- Chemistry & Radiation Protection
- Work Management
- Quality Verification
- Emergency Planning
- Learning Services and Performance Improvement
- Fire Protection

He then presented a graph showing future staffing projections during the last two years of operation which showed approximately 900-1,000 employees would be working at the site in the period 2024-2025 which is fewer than the approximately 1,300 employees including the decommissioning staff who now work at DCPD. He stated staffing reductions will be made

AGENDA PACKET DRAFT - JANUARY 29, 2019

through efficiencies and outsourcing certain work. The graph also showed the number of personnel assigned to decommissioning at the site. In response to Consultant McWhorter's query Mr. Guess stated at the present time these numbers are not entirely broken down into departmental levels for 2024-2025 period. In response to Consultant McWhorter's inquiry concerning the Learning Services/Training Department Mr. Guess stated the plant has projected its need for license classes for NRC-licensed reactor operators as well as for requalification training for Operations, Engineering and Maintenance personnel. He reported DCPD hired approximately 100 new employees each year for the past several years and on the whole has experienced an overall attrition rate of approximate 3.4%. He reported DCPD is now looking to hire non licensed operators for the Operations Department as well as technicians in the Chemistry and the Radiation Protection organizations.

Concerning Tier 2 of the Employee Retention Program Mr. Guess reported 88% of eligible employees have signed Tier 2 retention agreements and he stated these results are similar to those for Tier 1 agreements. Attrition and hiring are monitored both by individual departments and in the aggregate by the Nuclear People Committee. In response to Dr. Budnitz' inquiry Mr. Guess stated that in some but not in all cases DCPD has information concerning which individuals are planning to leave employment and planning based on necessary replacement in terms of employee numbers and qualifications is ongoing at the director level.

Mr. Guess reported that to support the Operations Department shifts a minimum of nine licensed operators are required to staff each on-shift Operations crew and Operations has five shift crews. Approximately 20 persons at DCPD hold Senior Reactor Operator (SRO) licenses who are not presently employed on shift work and who could therefore be used to backfill shift positions if necessary. Seven plant managers also hold SRO licenses and he stated with 27 additional licensed individuals who are not assigned to shift work the plant now has a healthy reserve of SRO licenses. Mr. Guess confirmed Dr. Lam's observation that there are more than 45 persons licensed as either SROs or Reactor Operators who are available for shift assignment at DCPD. Mr. Guess reported there are presently 38 persons in the licensed operator training program with two license classes scheduled to complete in March 2020 and February 2021 respectively. He reported initial licensed operator training takes 18-22 months to complete and DCPD is also conducting one initial non licensed operator training class of 12 operators, with that training occupying 6-10 months. He reported the previous licensed operator training class achieved a 100% pass rate on the NRC examination.

Mr. Guess displayed a graph which showed the results of the Tier 2 recruitment by age distribution and by departmental distribution and reported that under each distribution DCPD has achieved at least an 80% subscription for Tier 2 participation. He reported that certain departments will be able to take advantage of overlapping skills and one of the most significant challenges faced by the Maintenance organization concerns having a sufficient number of

AGENDA PACKET DRAFT - JANUARY 29, 2019

electrical maintenance technicians available as their skills are readily transferable to other departments within PG&E. Mr. Guess then reported on general workforce trends as follows:

- Maintenance “Fix It Now” Team will gradually grow to perform repairs and corrective maintenance as preventive maintenance tasks decrease versus Maintenance doing long term upgrades or planning for same.
- Head counts will gradually be captured from support organizations through attrition, combining functions or eliminating work.
- Licensed and non licensed operators will remain at levels required for shift staffing per license requirements to ensure safety and reliability. Mr. Guess described the minimum staffing required for an operations crew as: one SRO-licensed Shift Manager; one Unit-1 Control Room SRO-licensed Supervisor; one Unit-2 Control Room SRO-licensed Supervisor; one SRO-licensed Shift Technical Advisor; two Licensed Reactor Operators (one for each unit) and two additional Licensed Reactor Operators; and one licensed Work Control Lead to conduct pre-job briefs and emergency planning functions.
- Process optimization to realize efficiencies in work will continue,
- Leadership will monitor workforce needs, adjusting as necessary to ensure safety and reliability are not compromised.
- Contract resources will be utilized where appropriate in lieu of additional hiring.
- Projects will ramp down.

In response to Consultant McWhorter’s inquiry, Mr. Guess stated he could not speak to how any reduction in Emergency Planning staff might evolve through the end of the operating licenses.

Mr. Guess reported PG&E is providing opportunities to DCPD employees for professional development including paid college degree programs, career planning, rotational assignments in other PG&E organizations, retirement seminars, job shadowing and field visits, and by conducting hiring fairs. He displayed a timeline showing the period until 2025 and beyond, including the Tier 1 and Tier 2 periods, and he reported that while subscription to the retention agreements has been robust, approximately 3% of persons who signed up for Tier 1 left employment prior to conclusion of Tier 1 and those results are expected to be similar for Tier 2 subscribers. He stated DCPD’s goal remains to retain employees as necessary through 2025. He reported the severance benefits in an employee’s final years of service at DCPD are based upon the individual’s total years of service and provide a lump sum incentive to remain at the plant through 2025. In response to Dr. Budnitz’ question Mr. Guess stated DCPD presently believes and intends that the severance package will provide a sufficient retention incentive for employees to remain at DCPD after 2023.

AGENDA PACKET DRAFT - JANUARY 29, 2019

Dr. Budnitz stated the Committee included a Concern in its 29th Annual Report regarding employee retention and Dr. Budnitz stated if the Committee did not believe that DCPD was dealing with the issue of retention in a satisfactory manner, that Concern would have been elevated to the status of a Recommendation. He remarked the efforts described by Mr. Guess, in Dr. Budnitz' opinion, represent the types of efforts the DCISC would be likely recommend if it concluded DCPD's actions were not satisfactory.

Following Mr. Guess' presentation, Mr. Tom Marre was recognized. Mr. Marre remarked that PG&E has made statements in the past that emphasis would be placed upon hiring decommissioning employees locally and he wondered what that means. Mr. Guess replied the plant now has a small decommissioning staff and local hiring efforts might be achieved by having other DCPD employees assigned to serve on the decommissioning staff and he expects that DCPD would look to within the pool of experienced employees it already has and who are local residents. Mr. Marre stated the Bear Economic Group of Berkeley, California performed an economic study on the impact on San Luis Obispo County of the loss of approximately 1,300 well-paying jobs and of the effect on local taxes and schools and Mr. Marre remarked he disagreed with the Bear Economic Group's conclusion that decommissioning jobs would serve as replacements for lost jobs as jobs involving decommissioning do not pay as well and many persons may come from outside the local area for those jobs. Mr. Guess stated the decommissioning efforts will require a number of skilled personnel including engineering and technical personnel and the decommissioning workforce should approach 500 total individuals by 2025 and the decommissioning organization may need to look outside of DCPD for land permitting or other specialized skills. He remarked that in general there will also be a considerable number of construction and lower level technician jobs that may be compensated at lesser rates. Mr. Guess confirmed hiring locally was an important issue to PG&E and DCPD would like to hire internally whenever possible and there is good teamwork between the various PG&E lines of business in that effort. Mr. Garcia commented that the Hourglass Project has been undertaken in the local community to find ways to bring more businesses to the local area to assist the economy. Dr. Budnitz remarked that this is also an area of concern for PG&E's Diablo Canyon Decommissioning Engagement Panel.

Mr. David Weisman, representing the Alliance for Nuclear Responsibility was recognized. Mr. Weisman inquired when he might obtain a copy of the power point slides used for this public meeting. Mr. Rathie reported the power points would be available immediately following the public meeting. [A copy of all power point slides was subsequently provided to Mr. Weisman by email.] Mr. Weisman reported two of his colleagues, Ms. Rochelle Becker and Alliance for Nuclear Responsibility attorney Mr. John Geesman, were attending a CPUC pre-hearing conference concerning the PG&E bankruptcy and, as the DCISC has public meetings scheduled in February and June 2020 prior to the June 30, 2020 deadline set by the California Legislature for PG&E to have a finalized plan for exiting bankruptcy in order to be eligible under California Assembly Bill 1054's Wildfire Protection Plan, it would be useful if a presentation could be made at one or both of those meetings on the status of the bankruptcy proceedings. Mr. Weisman remarked concerning the decommissioning of the San Onofre Nuclear Generating Station (SONGS) in southern California that an outside decommissioning contractor was brought

AGENDA PACKET DRAFT - JANUARY 29, 2019

in by Southern California Edison and almost no former Edison employees were retained for the decommissioning of SONGS. He observed in the CPUC's current General Rate Case, as well as in the 2018 NDCTP, the assigned administrative law judges have required PG&E to provide a report to all parties concerning any effect of the bankruptcy on DCPD.

Dr. Lam thanked Mr. Guess for a very informative presentation.

Mr. Baldwin remarked that with reference to decommissioning of PG&E's Humboldt Bay Nuclear Power Plant the security and the radiation protection staffs as well as a number of other key groups within that station have provided a very valuable basis of experience throughout the SAFSTOR and decommissioning periods.

A short break followed.

XIII STAFF-CONSULTANT REPORT & RECEIVE, APPROVE AND AUTHORIZE TRANSMITTAL OF FACT FINDING REPORT TO PG&E

The Chair requested Consultant Wardell to report on the August 21-22, 2019, fact-finding visit to DCPD with Dr. Lam. Mr. Wardell reviewed the topics discussed with PG&E during that visit:

- Meet with NRC Senior Resident Inspector - Mr. Wardell reported the fact-finding team met with NRC Senior Resident Inspector Mr. Chris Newport. Topics discussed with Mr. Newport included the 1R21 outage and issues experienced with the Polar Crane variable frequency drive motor coupling, the RCP seal leakage issue, and **the possible decline occurring in human performance at DCPD due to a number of low level events taking place concerning which Mr. Wardell suggested the DCISC continue to monitor and periodically review with the NRC resident inspectors.** The DCISC representatives also discussed the NRC's processes and risk-informed regulations with Mr. Newport.
- Operational Decision Making - Mr. Wardell reported the DCISC team discussed with DCPD Operations staff the process for Operational Decision Making (ODM), a process he described as being used when there is an off-normal condition and which involves using several steps to reach a decision. ODM effectiveness reviews are subsequently performed and the DCISC representatives reviewed the ODM procedures relative to the Unit-2 main generator age-related stator coil insulation degradation and found the procedures to be satisfactory.
- Quality Verification Assessment of Abnormal Operating Procedures - the DCISC fact-finding team discussed the assessment of 91 fire protection procedures for off-normal situations. Mr. Wardell reported the Quality Assurance organization discovered some technical errors in these procedures which were written by a contractor and Quality Assurance's findings were reviewed by Operations. **Approximately 75 of the 91 procedures had been reviewed at the time of the DCISC's fact-finding visit and the full review is expected to be concluded by**

AGENDA PACKET DRAFT - JANUARY 29, 2019

mid-October 2019 and Mr. Wardell recommended the DCISC review the conclusion of that review.

➤ Spent Fuel Management - Mr. Wardell provided an update on the spent fuel risk management study by UCLA which is reviewing various options for dealing with spent fuel. He reported this study includes a Phase A, which employs a qualitative approach; and a Phase B which employs a quantitative approach. Dr. Budnitz commented the UCLA study is intended to identify every accident sequence that might affect the integrity of the spent fuel pools or produce a radioactive release and for each sequence the study attempts to quantify the likelihood of occurrence. Dr. Lam stated a major uncertainty in this study is the cask design and Mr. Wardell remarked he believes the UCLA study is looking at other possible cask designs apart from those now used at DCP. **The DCISC will review the UCLA study in a fact-finding when the study is completed.** In response to Dr. Lam's inquiry Mr. Baldwin stated that he has not seen a copy of the request for proposals PG&E is developing for vendors to provide spent fuel storage casks for use at DCP and he stated this issue falls within the ambit of the Decommissioning organization at the station.

➤ Containment Spray System - Mr. Wardell reported the Containment Spray System was reviewed during the fact-finding visit. This system is used to remove heat as well as to lower the pressure in and chemically remove fission products from Containment after a loss of coolant accident or a main steam line break inside Containment. The system functions by spraying water mixed with chemicals and sodium hydroxide from the top of Containment to lower the pH in the Containment sump to ensure radioactive iodine stays in solution. He reported each unit has two spray pumps and a tank of spray additive and the spray headers inside Containment are fed and controlled by various piping and valves. The DCISC team met with the system engineer, toured the system and reviewed flow diagrams and the performance agreement for the system which lists the system parameters that are reviewed periodically as well as pump test data and flow results for the system valves. The system health report for this Tier 1 system shows the system health for the Containment Spray System to be in Green status.

➤ Safety System Functional Failures - Mr. Wardell stated a safety system functional failure occurs when an event or condition which could have been averted prevents the fulfillment of a safety function. During the three-year period from 2012 to 2014 the plant experienced an increasing number of these events or conditions and in 2014 action was taken to improve performance. Mr. Wardell reported that since 2015 there has been only one such event, that having occurred in 2017.

➤ Refueling Outage 2R21 Preview.

AGENDA PACKET DRAFT - JANUARY 29, 2019

- Meeting with DCPD Site Vice President - Dr. Lam stated he met with Site Vice President Ms. Paula Gerfen to discuss recruitment and retention of employees, actions taken to enhance DCPD's safety culture, spent fuel management and the pending request for proposals for spent fuel casks, and the pending bankruptcy situation.
- Nuclear Safety Culture - Mr. Wardell reported DCPD maintains a healthy nuclear safety culture which includes ensuring employees will raise concerns, no matter how large or small and plant management will respond in a positive way and take action. DCPD employs a Nuclear Safety Culture Monitoring Panel which reviews safety culture situations and reports to upper management. He stated the NRC inspections also assess the presence of a Safety Conscious Work Environment which is a part of a healthy nuclear safety culture and the NRC's recent reports confirm DCPD presently exhibits a healthy nuclear safety culture.
- 2019 WANO Evaluations Results - Mr. Wardell reported this was a biannual evaluation and he stated WANO is a worldwide association patterned after INPO and the two organizations employ the same processes and the same teams. He stated the specifics of both WANO and INPO evaluations are shared in confidence but he stated he was able to publicly report that the results of the 2019 WANO Evaluation of DCPD were positive.
- Meet with New San Luis Obispo County Director of Emergency Services - The DCISC representatives met with Mr. Joe Guzzardi, the Emergency Services Manager of the San Luis Obispo County Office of Emergency Services (OES) and they extended an invitation to Mr. Guzzardi to attend and to make a presentation at the DCISC's February 2020 public meeting and Mr. Guzzardi indicated that he expects to be able to accept this invitation. Dr. Lam stated he had an informative discussion with Mr. Guzzardi concerning matters regarding OES budgetary issues before and after the plant shuts down. In response to Dr. Budnitz' inquiry Mr. Wardell and Dr. Lam replied they did not discuss during the fact-finding visit whether Mr. Guzzardi, who is relatively new to his position, had reached any assessment of the OES' present emergency planning capabilities to carry out the County's responsibilities in the event of an emergency involving DCPD. **Dr. Budnitz observed that it is the County's responsibility, acting through its Director of OES, to act on any protective action recommendation that might be made by PG&E/DCPD in the course of an emergency event. Dr. Budnitz remarked the DCISC's February 2020 public meeting may provide an opportunity to address this issue with Mr. Guzzardi.** Dr. Peterson stated it is important to have clarity in terms of responsibility and authority for making decisions regarding taking safety-related actions in emergency situations and he observed this was a major difference between the U.S. and Japan (prior to the accident at the Fukushima Dai-ichi Nuclear Power Plant (Fukushima)). Dr. Peterson reported the federal Code of Regulations is very clear in terms of delegating responsibility and authority for decisions related to the safety of a nuclear power plant to the plant staff.

Ms. Sherry Lewis of Mothers for Peace was recognized. In response to Ms. Lewis inquiry about the rationale for the confidentiality of WANO and INPO evaluations Mr. Wardell

AGENDA PACKET DRAFT - JANUARY 29, 2019

and Dr. Peterson replied that both organizations are and are intended to be extremely rigorous and frank in their evaluations and both can be very critical in their respective evaluations and the NRC, the DCISC, PG&E and all other nuclear power operators undergoing WANO and INPO evaluation have determined that the value of preserving the candor and confidentiality of such critical dialogues significantly outweighs interests of public transparency.

Mr. David Weisman of the Alliance for Nuclear Responsibility was recognized. Mr. Weisman reported that in the Joint Proposal PG&E pledged to continue providing the current level of funding plus a cost escalation factor for emergency support to San Luis Obispo County through the termination of the 10 CFR Part 50 licenses for both DCPD units, which period is expected to extend until 2035 and 2037 after which the facility would be an ISFSI-only facility. He remarked Southern California Edison has agreed to provide financial support to the Orange County OES until all spent fuel casks have been removed from the SONGS site. Mr. Weisman stated he has been closely following the various proceedings before the CPUC concerning the closure of DCPD and to his knowledge no party has challenged providing ratepayer funding for emergency services beyond what might otherwise be required by NRC or other federal requirements. Mr. Weisman stated the Alliance for Nuclear Responsibility fully supports continued funding at the agreed amounts to support San Luis Obispo County's OES and he stated it was his understanding that while the previous OES Manager Mr. Ron Alsop has retired the entire senior staff of OES has remained and continues to work under Mr. Guzzardi's leadership and he reiterated that the funding needs for OES prior to and after closure of DCPD were addressed by and funding is assured by the Joint Proposal.

Following a motion by Dr. Peterson, seconded by Dr. Budnitz, the August 21-22, 2019 Fact Finding Report was accepted by the Committee.

XIV ADJOURN AFTERNOON MEETING

The Chair observed the evening meeting of the Committee would be convened at 5:30 P.M. and he adjourned the afternoon meeting of the Committee at 4:00 P.M.

XV RECONVENE FOR EVENING MEETING

Dr. Lam reconvened the evening meeting of the DCISC at 5:30 P.M.

XVI COMMITTEE MEMBER COMMENTS

There were no comments by Members at this time.

XVII PUBLIC COMMENTS AND COMMUNICATIONS

Dr. Lam invited members of the public to address the Committee on matters not on the agenda for this meeting. There were no comments by members of the public at this time.

AGENDA PACKET DRAFT - JANUARY 29, 2019

XVIII DISCUSSION BY COMMITTEE & THE PUBLIC

Committee Comments and Receive Comments from Members of the Public Regarding a Potential Role for the DCISC to Review Nuclear Fuel-Related Issues After Expiration of the DCPD Operating Licenses.

Dr. Budnitz observed the phrase “after expiration of the DCPD operating licenses” should be corrected to read “after cessation of DCPD electricity generation” because the 10 CFR Part 50 licenses under which the plant presently generates electricity will continue for a long period of time following cessation of electricity generation.

Mr. Rathie directed the Committee’s attention to the section in the public agenda packet containing the proposed draft of a Second Restatement of the Committee’s Charter (Second Restatement) which was considered at the June 2019 DCISC public meeting together with two other versions of a Second Restatement. [This Second Restatement if approved would continue the DCISC’s safety review regarding nuclear fuel related matters until all fuel was safety transferred to the ISFSI.] At that time, in context of the 2018 Nuclear Decommissioning Cost Triennial Proceeding (NDCTP) now under consideration by the CPUC, after considerable discussion the Committee approved the draft included in the agenda packet for this public meeting as the version to be presented to the CPUC. He reported the agenda packet also contains a copy of the Post-Shutdown Summary prepared by the Committee’s Technical Consultants which has also been publicly discussed and reviewed by the Committee during previous public meetings. In response to Dr. Lam’s inquiry, Mr. Rathie confirmed that the Second Restatement has no status in the NDCTP as, on June 6, 2019 only one day after the DCISC June 4-5, 2019 public meeting, the Committee’s Motion for party status in that proceeding was denied.

Mr. Rathie reported another avenue remains open to the Committee to seek CPUC approval for the Second Restatement that being to file a separate Application for approval of the Second Restatement which was the method employed by the Committee in 2007 to obtain its current Restated Charter. [The original Charter for the DCISC having been issued by the CPUC on December 18, 1988 in D.18.12.083 as Attachment A to Appendix C.] Mr. Rathie stated that on advice of attorney Mr. Martin Mattes, the DCISC’s Special Counsel for regulatory matters, it may be advisable to delay filing of a separate Application until after the conclusion of the 2018 NDCTP and the schedule for filing such an Application might be taken up for consideration by the DCISC at its public meeting in February 2020. In the interim, the office of the Committee’s Legal Counsel would prepare a draft of an Application for possible approval at February 2020 public meeting. Mr. Rathie stated the purpose of including this item on today’s agenda was to provide an opportunity for members of the public to address the Committee on this matter.

Dr. Budnitz made a motion that the Committee adopt the draft Second Restatement provided in the public agenda packet for this meeting and direct Counsel to prepare the Application to the CPUC for adoption of the Second Restatement and that the Application be available for consideration at the Committee’s public meeting in February 2020 and submitted

AGENDA PACKET DRAFT - JANUARY 29, 2019

expeditiously following the conclusion of the NDCTP. Dr. Lam stated that there has been a good deal of discussion on this matter and on the timing of submitting an Application and while Dr. Lam stated he was not enthusiastic about accelerating the schedule with the understanding the Application would be submitted following conclusion of the 2018 NDCTP he provided a second to Dr. Budnitz' motion.

Dr. Budnitz stated the Second Restatement makes the most sense in terms of safety issues and timing. He commented there is no doubt that soon after the plant shuts down there will be less risk to the public and the risk to the public diminishes substantially after approximately 18 months following transfer of the last of the fuel from the core to the spent fuel pool, as the risk of a zirconium fire due to loss of water from a spent fuel pool, which Dr. Budnitz identified as a major accident sequence, will have passed. Dr. Budnitz observed the rationale for extending the Committee's safety review beyond that point after all fuel is safety transferred to the ISFSI is weaker, as operations at that point are entirely passive and the likelihood of a release is very remote. He commented it may take the CPUC and the public some time to assess the merits of the Committee's recommendation and their priority for doing so may be low. He recommended as the Second Restatement is to be submitted outside the NDCTP the Committee should wait until the 2018 NDCTP has concluded and then act as soon as possible.

Dr. Lam stated his initial hesitation in seeking a restatement of the DCISC's Restated Charter was based upon his perception that it might be premature and might appear the Committee was self-serving in seeking to prolong its existence. Dr. Lam stated his preference would have been for the DCISC's appointing authorities to take the initiative concerning a second restatement of the Restated Charter and he cited certain objections voiced by a member of the public in the 2018 NDCTP that the Committee should have no role during decommissioning. Dr. Lam stated that with the passage of time he now believes submitting an Application to be the correct thing to do.

Dr. Budnitz remarked that activities preparatory to decommissioning are taking place now at DCPD and decommissioning the plant is expected to begin soon after electricity generation ceases. He reported that the draft Second Restatement explicitly disclaims any review by the Committee of decommissioning activities [unrelated to those associated with nuclear fuel-related activities].

Dr. Peterson stated he was in accord with the position articulated by Dr. Lam. Dr. Peterson remarked the Post-Shutdown Summary is a very informative document regarding the scope of matters that may fall under the DCISC's purview as well as the degree and scope of the risk that occurs at various stages following shutdown. Dr. Peterson observed that following cessation of electricity generation by DCPD the role the Committee has historically played will largely disappear and the work of the Committee will need to be reorganized and the recommendation that the Committee cease its existence after all spent fuel has been transferred to the ISFSI is an appropriate point in time, but ultimately it is the CPUC that will need to reach

AGENDA PACKET DRAFT - JANUARY 29, 2019

a conclusion. Dr. Peterson stated he supports Dr. Budnitz motion on moving forward with this matter.

In response to Consultant McWhorter's comment, Mr. Rathie replied that between now and the February 2020 public meeting a draft Application would be prepared and circulated for review and individual comments from the Members. Dr. Budnitz observed there is a need to be explicit on the fact that the Committee is not proposing to review decommissioning activities *per se* to preclude a misunderstanding. Consultant Wardell stated he agreed with the discussion and he emphasized that the scope of the Committee's review under the Second Restatement should be limited to nuclear fuel-related issues. Dr. Peterson remarked while the plant continues to generate electricity the DCISC will continue its role of reviewing decommissioning activities in context of any effect of decommissioning-related activities on safety of operations, akin to how the DCISC now reviews the safety/security interface concerning operations. Consultant McWhorter stated a distinction might need to be drawn to the effect that after the plant shuts down the Committee will not review decommissioning activities that affect lower level waste. Dr. Budnitz remarked that it is his technical view that decommissioning activities that do not affect spent fuel have no potential to produce an important release.

Ms. Sherry Lewis of Mothers for Peace was recognized. Ms. Lewis inquired whether the DCISC might have a role if spent fuel was sent to some other location. Drs. Budnitz and, Peterson responded the State of California has reviewed and would further review all off-site transportation plans for spent fuel by DCPD and the competency to do so lies with the California Energy Commission.

Ms. Jane Swanson of Mothers for Peace was recognized. Ms. Swanson stated that as a spokesperson for the Mothers for Peace she concurred with the Second Restatement as the safe handling and storage of highly radioactive waste is an issue that needs close attention now and for a long period after DCPD ceases operation. She observed the DCISC has invested much time and attention to issues related to the design of the dry cask storage system at DCPD. She remarked the efforts of the Diablo Canyon Decommissioning Engagement Panel and the experiences of the SONGS decommissioning would help inform the issues. Ms. Swanson stated all the available information offers the public the opportunity to put PG&E on notice to put safety and not budgetary concerns first. Ms. Swanson stated the design of the storage casks will be of critical importance as fuel presently remains in the DCPD spent fuel pools awaiting transfer to casks that do not yet exist and as more waste is generated every day for the next six years the work of monitoring safety will be needed throughout that period and for the long-term. She remarked the spent fuel casks will need continued protection and plans for their eventual transfer offsite will need to be formulated and she urged the DCISC to stay involved and to influence the strength and design and suitability for transportation of the casks. She stated her concern regarding PG&E's plan to destroy the spent fuel pools, as it is her belief they could serve as a tool in the event one or more casks required repackaging. Ms. Swanson stated the DCISC was created to offer the public and the PG&E's ratepayers an additional level of oversight of the

AGENDA PACKET DRAFT - JANUARY 29, 2019

operations at DCPD and this need will remain as long as high-level waste remains on the site and this will likely extend for decades and possibly centuries.

Dr. Budnitz observed there is no federal policy in place concerning what will happen to the spent fuel stored at DCPD or at the other 60 nuclear power plant sites in the U.S. and review of any proposal to change the cask design for DCPD would be within the scope of the DCISC's review. Dr. Budnitz stated that it is possible to have confidence that such casks might last for decades but not for hundreds of years.

Dr. Peterson remarked there is a strong constraint on the design of nuclear fuel dry storage casks which is created by the parameters of the existing ISFSI which is designed to hold canisters of the Holtec firm's design. Dr. Peterson stated to design a new ISFSI facility would likely take decades and would result in a long delay in offloading fuel which could not be justified based on a risk perspective. He opined the casks to be used for future storage would likely be quite similar to those used by DCPD in the recent past with the exception of changes with respect to thermal capabilities of new casks so as to facilitate accelerated offloading of fuel. Dr. Peterson stated the transportation casks that have been licensed for the Holtec-designed canisters have been reviewed and these casks do not rely on the canisters having leak integrity which means if there is a problem with a canister at DCPD the most appropriate action would be to transfer the canister into a transportation cask.

In response to Ms. Swanson's question as to whether the fuel is expected to remain forever in the same cask in which it was transported Dr. Peterson stated he has confidence that future generations will do things much better in the next decades as they will be facing extraordinarily difficult challenges concerning global intractable disposal of carbon dioxide which will exceed the challenges to be faced concerning the final disposal of nuclear waste. In summary he stated there is no practical way to greatly modify the cask design and stay on a reasonable schedule for emptying the spent fuel pools and the risks associated with long-term dry storage on the site are reasonable as if necessary the fuel can be repackaged in other casks. He stated it is his hope that the waste will be managed properly and moved within the next two decades. Ms. Swanson stated she appreciated Dr. Peterson's perspective and she agreed that carbon dioxide and climate change are some of the worst and most depressing problems future generations will face but she observed Mothers for Peace became interveners in certain matters in 1973 because having faith that a problem will be solved in the future while continuing to cause the problem had not worked well at all. Ms. Swanson stated it is her opinion that high level radioactive waste in its own right deserves its own particular focus despite the existence of other pressing issues.

Dr. Budnitz stated the experience and results of the shut down and decommissioning of the Yankee Rowe Nuclear Power Plant in Massachusetts in 1992 may help inform the discussion as at the present time there is nothing visible at that site but a green field and an enclosure with sixteen spent fuel dry storage casks sitting behind a fence and the site continues to be safe and

AGENDA PACKET DRAFT - JANUARY 29, 2019

secure. Dr. Budnitz remarked that if in 20 or 25 years from now the same situation exists at the site of DCPD with no corrosion or other compromise to the integrity of the casks he would be satisfied as any policy on final disposal of commercial nuclear waste must await action by the federal government. He stated his vision for the Committee's post-shutdown role is for the DCISC to provide independent oversight review and if necessary to use its influence regarding activities until all the fuel is within dry storage casks and there are adequate assurances that the cask corrosion issue is not going to be a compromise.

Dr. Peterson stated that concerning the management of spent nuclear fuel the United States is unique in some respects and in Europe the majority of countries with nuclear programs do not store spent fuel at the plant but transport fuel to central repositories where some fuel is reprocessed. He reported there has never been any harm or radioactive release associated with any of those activities as nuclear waste is different from other categories of hazardous materials and is packaged in very robust containers and accordingly the risk to the public from transportation is quite small compared to other hazardous materials such as chemicals. Dr. Budnitz observed the U.S. has a great deal of successful experience in transporting nuclear weapons and other nuclear material and waste and while the risk is small it is not zero and it is the role and function of committees such as the DCISC to identify areas where compromises may exist and to fix them. Ms. Swanson observed with nuclear materials there is the issue of the probability as compared to the catastrophic consequences of something going wrong. Dr. Peterson reiterated that the hazards associated with spent fuel after a certain period of time are quite small, as it would be difficult to have an accident where decay heat could mobilize radioactive nuclides and the risk of an accident associated with operating a water-cooled reactor are much larger. Dr. Lam remarked there is also a risk of a malicious act occurring but federal regulations preclude a public discussion of that matter. Dr. Peterson commented the federal Department of Homeland Security coordinates its activities with the NRC and in Dr. Peterson's view the risks of a terrorist attack during spent fuel transport would likely produce a lesser consequence than an attack on certain other targets. Ms. Swanson directed the attention of the Committee and those in the audience to the Mothers for Peace website and an article posted on that site by Dr. Gordon Thompson concerning this topic.

Dr. Budnitz reported the UCLA spent fuel risk study commissioned by PG&E is intended to identify all the important accident sequences that could cause a radioactive release from the spent fuel pools or from transportation of fuel around the site as well as to assess the consequences and to estimate the likelihood of those accidents or activities. Dr. Budnitz opined this could be a very valuable study and may provide a much better understanding and assist the Committee and others to concentrate their resources where they matter and to better understand where intervention may make a difference.

Mr. David Weisman of the Alliance for Nuclear Responsibility was recognized. Mr. Weisman requested an electronic copy of the Second Restatement [which was provided to him by Mr. Rathie]. Mr. Weisman advised the Committee to bear in mind that the plant may not operate until 2025 and he suggested the presumption that it would close in sometime between

AGENDA PACKET DRAFT - JANUARY 29, 2019

2021 and 2023 should be entertained in the Committee's consideration of a post-shutdown role. He encouraged the DCISC to continue to assess and define the separation of what its role might be with reference to decommissioning activities as differentiated from spent fuel-related activities. He commented the expedited transfer of spent fuel is an issue presently being litigated in the 2018 NDCTP. Mr. Weisman suggested that the DCISC's Legal Counsel may want to consult with PG&E concerning entering into nondisclosure agreements which may be required due to proprietary considerations to expedite and enable the Committee to review the request for proposals for selecting a dry cask storage system which is now being prepared by PG&E.

The Committee then returned to the motion made previously by Dr. Budnitz and seconded by Dr. Lam. [The motion being that the Committee adopt the text of the draft Second Restatement provided in the public agenda packet and direct Counsel to prepare an Application to the CPUC for adoption of the Second Restatement and that the Application be available for consideration at the Committee's public meeting in February 2020 and submitted expeditiously following the conclusion of the 2018 NDCTP.] That motion was then unanimously approved by the Members. Mr. Rathie confirmed that a draft Application will be prepared and circulated separately amongst the membership in accordance with Committee procedures prior to the February 2020 public meeting.

XIX ADJOURN EVENING MEETING

The Chair adjourned the afternoon meeting of the Committee at 6:50 P.M.

XX RECONVENE FOR MORNING MEETING

The October 24, 2019 morning public meeting of the Diablo Canyon Independent Safety Committee was called to order by its Chair Dr. Peter Lam at 9:35 A.M. Dr. Lam welcomed those persons present in the audience and watching the proceedings on live streaming video. Dr. Lam requested any of the members who wished to make remarks to do so at this time.

XXI COMMITTEE MEMBER COMMENTS

There were no comments by Members of the Committee at this time.

XXII PUBLIC COMMENTS AND COMMUNICATION

The Chair reviewed the invitation to address the Committee on matters not on the agenda for this public meeting and he invited any comments from members of the public who wished to address the Committee to do so now. There was no response to this invitation.

XXIII INFORMATION ITEMS BEFORE THE COMMITTEE (Cont'd.)

The Chair requested Mr. Baldwin to introduce the next presenter. Mr. Baldwin introduced DCPM Manager of Regulatory Mr. Hossein Hamzehee and reported Mr. Hamzehee has more than 30 years of experience in the nuclear industry and holds a Master of Science

AGENDA PACKET DRAFT - JANUARY 29, 2019

Degrees in Nuclear and Mechanical Engineering and brings extensive experience with the NRC including at the level of an NRC Branch Chief.

Update on the Status of NRC Performance Indicators, Licensee Event Reports, NRC Inspection Reports and Notices of Violation and Issues Raised by NRC Resident Inspectors and Major Regulatory and Open Compliance Issues, and License Amendment Requests.

Mr. Hamzehee reported DCPD is rigorously inspected by the NRC and is committed to the highest standards of safety. Mr. Hamzehee stated in his presentation he would provide an overview of DCPD performance based on NRC's performance indicators since the last meeting of the DCISC in June 2019 through the end of September 2019. He remarked his presentation would cover approximately four months of NRC inspections involving approximately 1,800 hours of inspection time. During this period DCPD met all Green performance expectations for all NRC performance indicators. Three violations of very low safety significance were issued by the NRC since the last DCISC meeting in June 2019 and no events occurred that required the submittal of a Licensee Event Report (LER).

Mr. Hamzehee reviewed and briefly discussed some of the 16 performance indicators reviewed and used to collect data by the NRC, and concerning which data is collected daily, all currently being within Green status as follows:

- Unplanned Scrams per 7000 Critical Hrs.
- Unplanned Power Changes per 7000 Critical Hrs.
- Unplanned Scrams with Complications.
- Safety System Functional Failures.
- Mitigating Systems Performance Index, Emergency AC Power System.
- Mitigating Systems Performance Index, High Pressure Injection System.
- Mitigating Systems Performance Index, Heat Removal System.
- Mitigating Systems Performance Index, Residual Heat Removal System.
- Mitigating Systems Performance Index, Cooling Water Systems.
- Reactor Coolant System Activity.
- Reactor Coolant System Leakage.
- Drill/Exercise Performance.
- ERO Drill Participation.
- Alert & Notification System.
- Occupational Exposure Control Effectiveness.
- Radiological Effluent Occurrence.

The safety significance characterizations used for the performance indicators are Green (very low), White (low to moderate), Yellow (substantial), or Red (high). Green non cited violations

AGENDA PACKET DRAFT - JANUARY 29, 2019

indicate very low safety significance, with no impact to public health and safety. In response to Consultant Wardell's inquiry Mr. Hamzehee replied that at present none of the indicators, each of which represents a rolling average, are close to entering White status. He confirmed Dr. Budnitz' observation that these are the NRC's own indicators and the NRC provides the grading.

Mr. Hamzehee reported on violations issued by the NRC for the period June 2019–September 2019 and stated there were three such violations issued as follows.

- Non Cited Violation (Green) - during restoration from a surveillance test of Unit-2 4kV bus F, the bus was automatically transferred to startup power due to an invalid loss of bus voltage signal. (Cross-cutting aspect assigned of H.12a - Avoid Complacency.) Mr. Hamzehee reported this violation was identified by the NRC resident inspectors and was due to a technician inadvertently leaving a jumper in place. A number of safety systems such as ASW pump 2-3, Containment fan coolers 2-1 and 2-2, and Emergency Diesel Generator (EDG) 2-3 received a start signal but EDG 2-3 was out of service for maintenance EDG 2-3 did not start. Mr. Hamzehee stated that as this event involved an invalid start signal it did not require submission of a LER under 10. CFR 50.73.
- Non Cited Violation (Green) - DCPD procedure did not contain sufficient guidance to ensure the exhaust damper blades were maintained in required position. (Cross-cutting aspect assigned of H.11 - Challenge the Unknown.) This violation was discovered during the NRC Design Basis Assurance inspection team's walkdown of the 480V switchgear room ventilation system when a few of the dampers were stuck and not fully open. Maintenance Department evaluation determined the system was fully functional and the system was functioning at the time of the inspection team's visit but procedural guidance to verify positioning was adequate was not available. Mr. Hamzehee reported the NRC does not generally assign a cross-cutting aspect when a deficiency is identified by the licensee or when the performance is not reflective of current performance. Dr. Peterson stated he found this particular violation to be in the category of matters that are not sufficiently important to receive regulatory attention as the system was demonstrating full operability and meeting all its safety functions at the time of the discovery of the damper blade positions and by identifying this as a violation the NRC may have added unneeded procedural requirements that are not correlated with safety. Dr. Peterson observed this can be corrosive to safety culture as it may cause personnel to question regulatory requirements.
- Finding (Green) - Station procedures did not require documenting as-found data for contact resistance of some breakers. (No Cross-cutting aspect assigned.) Mr. Hamzehee reported this finding was also identified during the NRC Design Basis Assurance inspection and involved preventive maintenance procedures for some 4160V AC breakers. The NRC determined there was a lack of procedural guidance in documenting the as-found condition of the breakers. Dr. Peterson observed that one of the more important tasks one can perform is to extensively document as-built, as-found, and as-fixed conditions and were DCPD to transition to the use of electronic procedures there would be much better capability to document these

AGENDA PACKET DRAFT - JANUARY 29, 2019

conditions and to then scrub the data with analytical tools to increase the usefulness of the data and DCP's failure to undertake a transition to increase its use of electronic procedures represents in Dr. Peterson's opinion a missed opportunity for improvement. Mr. Hamzehee stated in response to Dr. Budnitz' query that the DCP collects as-found data but doing so in this instance was not part of the procedure.

Mr. Hamzehee reported DCP's overall performance is Green with respect to NRC performance indicators over the period of the past four months. He reviewed inspection activities since the last meeting of the DCISC in June as follows:

- Design Basis Assurance Inspection Report (2019-010, 8/1/2019).
- 2nd Quarter 2019 Integrated Inspection Report (2019-002, 8/1/2019).

Dr. Budnitz reported that the Committee received both the above mentioned reports along with many other reports it receives from DCP on a monthly basis. Mr. Hamzehee reported that with the exception of reports related to security or safeguards information all NRC reports are publicly available.

In response to Consultant McWhorter's inquiries Mr. Hamzehee and Mr. Garcia stated the preliminary results of the 3rd Quarter 2019 NRC Inspection Report include one Green observation. Mr. Hamzehee, in response to Mr. McWhorter's observation, stated in response to an increasing number of low-level human performance events DCP has initiated a number of efforts including trending minor violations to attempt to gain insight and has been communicating with the NRC resident inspectors on this effort. No trends have been identified to date. Dr. Peterson commented and Mr. Hamzehee agreed that DCP is a very high performing plant compared with others in the industry and Dr. Peterson remarked this fact changes somewhat the job of the regulator as the degree of transparency between the licensee and the regulator is increased which he commented was not always the case in the past where some plants may have viewed the NRC as an adversary. Dr. Peterson remarked that nuclear power plants that performed poorly in the past in many cases were sold to new owners and afterwards plant reliability and capacity factors often went up significantly in a relatively short period of time and this good performance was very much driven by the attitude and behavior of senior plant management. Dr. Peterson commented that excellent performance is in part driven by a transparent relationship with the regulator and also by taking advantage of opportunities for improvement. Mr. Hamzehee agreed and stated plant performance and affordability are closely linked concepts and he pointed out that not all nuclear power plants are within Column 1 of the NRC Reactor Oversight Process Action Matrix and DCP has held that status for the last three or four years. **Mr. McWhorter suggested and Mr. Hamzehee agreed that for future presentations to the DCISC it would be helpful for DCP to share with the DCISC the current status of how many entries are then currently within each of the various cross-cutting aspect categories of plant performance.**

AGENDA PACKET DRAFT - JANUARY 29, 2019

Mr. Hamzehee reported that the License Amendment Request (LAR) by DCPD for 90-minute Emergency Response Organization staff augmentation was approved by the NRC in August 2019 and implementation will be completed by January 2020. He reported DCPD submitted a LAR to reclassify the Intake Structure in February 2019 and the plant has responded to requests for additional information from the NRC and review is expected to be completed by early 2020. There were no contentions filed.

In response to Consultant Wardell's inquiry concerning the NRC effort to reduce the regulatory burden on its licensees Mr. Hamzehee stated the NRC is not simply reducing the number of its inspection activities but rather seeking to use the approximately 4,000 operating-years of reactor operating experience it now has to create a more risk-informed regulatory regime which will devote resources and inspection hours to issues that have been known problems in the past. He stated the NRC is also reviewing the frequency of certain inspection activities in this effort.

Following Mr. Hamzehee's presentation, Mr. Tom Marre, a resident of Avila Beach was recognized. Mr. Marre stated that in response to what he described as Dr. Peterson's glowing comments, PG&E is currently in bankruptcy and DCPD is an old plant and it is heading toward decommissioning. Dr. Budnitz responded and stated that every safety-significant aspect of DCPD's operations has been reviewed on a regular schedule and the plant is constantly being inspected and its equipment renewed. Dr. Peterson observed that the PG&E Corporation is systematically using DCPD staff to assist it in addressing problems experienced in other area of the company.

Mr. David Weisman of the Alliance for Nuclear Responsibility was recognized. Mr. Weisman commented that when statements are made concerning PG&E paying for improvements it is the ratepayers that really pay these costs. He commented as DCPD approaches decommissioning there is less data available on what he described as the infamous bathtub curve as to date no reactor in California has operated to the end of its active license from the NRC. Drs. Peterson and Budnitz remarked that a number of Westinghouse designed four loop pressurized water reactors have operated much longer than DCPD will have operated by 2025 and the industry relies upon industry-wide data to inform a plant's specific data. Mr. Weisman stated the Alliance for Nuclear Responsibility's testimony in PG&E's current General Rate Case has been to the effect that the above-market cost for DCPD is around \$500 million per year and there is a question of how long the plant will warrant the investment being required of PG&E's ratepayers. Dr. Budnitz concurred with Mr. Weisman that safety costs money but he observed the Charter of the DCISC is focused on safety of operations and while the Committee is cognizant of the cost of safe operation it does not principally focus upon those costs. Dr. Lam stated that to the extent a budgetary matter might impact safety the Committee would not hesitate to examine that issue and as the plant continues toward closure in 2025 DCPD will face issues of diminishing resources. Dr. Budnitz commented in its 29th Annual Report, approved at this public meeting, the Committee expressed its concern over the ability of DCPD to retain qualified

AGENDA PACKET DRAFT - JANUARY 29, 2019

and technically competent employees as well as upon PG&E's ability to continue to make the investment necessary to keep the plant running safely. He observed that the Committee previously took the unprecedented action of sending a letter to the California Legislature concerning what the Committee perceived to be the potential for compromise between funding requirements and safe operation of the power plant. Dr. Weisman stated it was his hope that the same level of concern will be taken as the company's finances are redistributed or employees are terminated.

Mr. Baldwin introduced Mr. Eric Nelson, Director of DCPD Decommissioning Projects. Mr. Baldwin reported Mr. Nelson has approximately 30 years of increasing experience and responsibility with PG&E running a number of projects and organizations including most recently leading DCPD's effort in connection with the Licensing Basis Verification Project to reconstitute the plant's licensing basis to ensure the plant runs safely consistent with its licensing basis.

Decommissioning Planning Update.

Mr. Nelson reported the 2018 Nuclear Decommissioning Cost Triennial Proceeding (NDCTP) was established by CPUC to examine nuclear decommissioning issues for DCPD and PG&E's Humboldt Bay Nuclear Power Plant (HBPP). He stated the NDCTP is a three-year filing regarding PG&E's estimate of the cost of nuclear decommissioning and updated assumptions, for HBPP only a review of decommissioning projects which have been accomplished since the past filing, the rate of return for funds invested by the Nuclear Decommissioning Trust (NDT), and funding requirements and assumptions. Mr. Nelson remarked that the intent of the NDCTP is to provide for the ratepayers that benefitted from nuclear power generation to be responsible for paying the decommissioning costs. PG&E filed its 2018 NDCTP Application on December 13, 2018. The NDCTP will establish the annual revenue requirements for nuclear decommissioning expenses for decommissioning both DCPD and HBPP. Mr. Nelson reported HBPP is in the last stages of decommissioning. In response to Dr. Lam's inquiry Mr. Nelson replied that the rate of return assumption for the NDT funds is consistent with past performance and is not intended to be overly optimistic.

In response to Dr. Peterson's inquiry Mr. Nelson stated the estimated amount needed for decommissioning, in 2017 dollars, is currently \$4.8 billion and the NDT fund balance at conclusion of 1Q2019 for Unit-1 was \$1.414 billion and for Unit-2 that balance was \$1.850 billion, a combined amount of slightly less than \$3.3 billion. Mr. Nelson displayed a list which identified and described the decommissioning milestones which PG&E uses to compare, plan and evaluate progress for future NDCTP filings. He remarked that there are certain activities such as security for which it is difficult to specifically ascribe a cost to an identified milestone in the decommissioning process. In response to Dr. Peterson's observation Mr. Nelson confirmed that as part of its lease for the land PG&E presently has an obligation to remove the breakwater at the DCPD Intake Cove and efforts are continuing to determine whether the lease can be amended or the breakwater can be repurposed and if that were to happen the cost to remove the

AGENDA PACKET DRAFT - JANUARY 29, 2019

breakwater would be deleted in a subsequent NDCTP filing and the decommissioning milestones would be adjusted accordingly.

Mr. Nelson reviewed the status of the 2018 NDCTP and the projected timeline for subsequent filings including protests received, prehearing conferences, issuance of scoping memos, conducting technical workshops, public participation and information hearings and evidentiary hearings. He reported opening briefs are due in November 2019 and reply briefs in December 2019. Mr. Nelson reported the administrative law judge originally assigned to the 2018 NDCTP has left her employment with the CPUC and a new judge has been assigned and the CPUC Commissioner assigned to the proceeding has also changed from former CPUC President Picker to current CPUC President Batjer. Mr. Nelson stated PG&E presently expects a proposed decision to be issued by the end of the first or second quarter of 2020.

Mr. Nelson reviewed the expected results of the 2018 and future NDCTP proceedings that will precede the closure of the power plant as follows:

- 2018 NDCTP approval would result in detailed project descriptions for permitting. Proceeding with NRC licensing efforts. Proceeding with detailed planning and engineering work.
- 2021 NDCTP update of costs with available results of licensing, permitting, and proposed repurposing. Decision made on contracting strategy.
- 2024 NDCTP last update prior to licenses expiring. This will include results from issued permits (e.g., permitting conditions, mitigation) and licensing approvals.

Mr. Nelson stated PG&E submitted an exemption request to the NRC on December 13, 2018, to allow prior to plant shutdown the withdrawal of \$187.8 million [in 2017 dollars] from the Diablo Canyon NDT. He reported this amount would be in excess of the allowed 3% [\$37.2M] the NRC has placed on the withdrawal of NDT funds to fund decommissioning planning activities, including those associated with spent fuel management and site restoration. He reported the NRC's obligation in decommissioning and the purpose for the NDT's funds is to ensure that sufficient funds are available for completion of radiological decommissioning and license termination activities. Activities associated with planning, spent fuel management and site restoration are not allowed to be funded by the NDT absent an exemption. Mr. Nelson reported the NRC approved the exemption request on September 10, 2019. The NRC performed an economic analysis consistent with NRC regulations using different assumptions than those used by PG&E in the 2018 NDCTP. Mr. Nelson stated granting the exemption has allowed the planning activities to proceed and in response to Dr. Lam's question Mr. Nelson stated this is a one-time exemption that will provide adequate funds for DCPP through the shutdown of Unit-1.

Mr. Nelson provided a timeline showing project and permit phasing and he stated decommissioning will not be complete until all facilities, including the ISFSI, are removed from the site, remediation and surveys are completed, and the fuel transferred and he commented this is presently estimated to occur by 2072. Mr. Nelson reported most of the radiological

AGENDA PACKET DRAFT - JANUARY 29, 2019

decommissioning activities should be complete by 2035 and a Phase Two submittal, including coastal development permits, will be prepared in 2030 once it has been determined whether the breakwater is to be removed.

Mr. Nelson reviewed highlights of ongoing work:

- NDCTP Support/Responding to Discovery and Data Requests.
- Permitting.
- Public Engagement.
- NRC Submittals Including for Expedited Spent Fuel Transfer.
- Decommissioning Safety Analysis Report (DSAR) and Development of New Technical Specifications.
- Planning/Scheduling Work.
- Procedures/Processes.
- Benchmarking.
- Expedited Spent Fuel Transfer Request for Proposals.

Mr. Nelson reported the CPUC Order in the Decision approving the Joint Proposal requires PG&E to take no action with respect to any of the DCCP lands or facilities whether owned by the utility or a subsidiary before completion of a future process including a public stakeholder process. Therefore, there will be further local input and CPUC review prior to the disposition of DCCP facilities and the surrounding lands. Mr. Nelson provided a chart showing the various elements of the public outreach process and how they intersect and are coordinated between PG&E and the Diablo Canyon Decommissioning Engagement Panel (DC DEP). He reported the DC DEP has held a number of public meetings and workshops to foster community engagement. Mr. Nelson remarked the DC DEP has expressed its appreciation to the DCISC for the DCISC willingness to serve as a resource and provide technical guidance.

In response to Dr. Lam's observation that at present, in 2017 dollars, there is a shortfall in the NDT funds of approximately \$1.5 billion, Mr. Nelson stated PG&E believes it is appropriate to provide for recovery of that amount starting in 2020 through the end of the plant's operating lifetime so that all funds required are collected by that time. Mr. Nelson, in response to Dr. Budnitz' comment that the DCISC's remit does not extend to much of the scope covered by the NDT funds, stated activities under the 10 CFR Part 50 licenses should essentially be complete by 2038 and the time between 2038 and 2070 is principally associated with spent fuel management and site restoration activities. Dr. Budnitz observed the Committee's mandate is to review nuclear safety concerns and therefore the Committee has an interest to ensure adequate funding is available for a period of approximately the next ten years. Dr. Lam observed and Mr. Nelson agreed the shortfall identified at present may be significantly reduced if the need to remove the breakwater is eliminated. In response to Consultant Wardell's inquiry Mr. Nelson replied that an information only copy of the DSAR is expected to be submitted to the NRC in 2020 and the activities associated with the development of the DSAR include ensuring the knowledge of the

AGENDA PACKET DRAFT - JANUARY 29, 2019

licensing basis as provided by the Final Safety Analysis Report (FSAR) is included with new technical specifications. In response to Dr. Budnitz' inquiry Mr. Nelson stated that to his knowledge there are no technical issues in the DSAR beside seismic which would make the DCPD DSAR different from those developed by other nuclear power plants although the DCPD FSAR is more complicated than those for other plants. He reported DCPD has benchmarked this matter with other plants and will continue to do so.

The Chair thanked Mr. Nelson for a very informative presentation.

Mr. David Weisman of the Alliance for Nuclear Responsibility was recognized. Mr. Weisman commended the Committee's attention to the transcripts of the 2018 NDCTP including the cross examination of PG&E's witnesses by The Utility Reform Network concerning fiscal matters. Mr. Weisman stated that in accordance with its status as an interested party in the 2018 NDCTP the Committee receives copies of the proceeding's transcripts. Mr. Weisman stated there is adequate and ample funding in the NDT to address radiological contamination at DCPD.

A short break followed.

XXIV STAFF-CONSULTANT REPORT & RECEIVE, APPROVE AND AUTHORIZE TRANSMITTAL OF FACT FINDING REPORT TO PG&E

The Chair requested Consultant McWhorter to report on the September 11-12, 2019 fact-finding visit with Dr. Budnitz to DCPD. He reviewed the topics discussed with PG&E during the September 11 - 12 2019 visit as follows.

➤ Operations Shift Turnover Briefing - Mr. McWhorter reported this briefing included all licensed and non licensed operators on the morning shift that day and included a review of activities, tests to be run, and maintenance to be performed during the shift. In general, Mr. McWhorter reported the DCISC representatives found the briefing was very orderly, well oriented and professional in its demeanor. Dr. Budnitz reported when the DCISC fact-finding team passed through the Control Room on the way to the briefing they found it clean, orderly and well managed. Following the briefing the DCISC fact-finding team walked down the Turbine Deck and observed the large number of activities for pre-outage preparations for the Unit-2 stator rewind project taking place on the Turbine Deck. Mr. McWhorter reported the DCISC representatives found the Turbine Deck to be clean and orderly despite the large amount of equipment present.

➤ ALARA Review Committee Meeting - The As Low As Reasonably Achievable (ALARA) Review Committee reviews personnel radiation exposure-related activities to ensure dose is limited in accordance with ALARA principles. The ALARA Review Committee during the DCISC's visit reviewed three plans including high radiological risk and also reviewed work permits to be issued for the 2R21 refueling outage for lower reactor cavity entries, seal table, and In-Core Detection System work. The DCISC found the ALARA Review Committee's plans and its work to be appropriate focused and helpful to ensure minimal personnel radiation exposure during plant activities.

AGENDA PACKET DRAFT - JANUARY 29, 2019

- **FLEX³ Program** - the FLEX Program maintains portable equipment at the station which is to be used to respond to beyond design basis accidents in a purpose-built facility next to the DCPD Fire Station and at a location adjacent to the ISFSI. Mr. McWhorter reported the FLEX Program is now in what he described as a maintenance stage. The NRC issued a final rule in August 2019 regarding the Flex Program and DCPD's evaluation found the plant's program complied with all requirements of the new rule. The NRC also issued a regulatory guide concerning the procedural interaction between emergency procedures and implementation of FLEX and Mr. McWhorter reported DCPD has implemented changes to its emergency procedures to align with the NRC's regulatory guide. The recent conclusion of annual testing of FLEX equipment found one dead battery on a front-end loader which was promptly addressed. Mr. McWhorter reported there are approximately 61 major pieces of equipment involved in FLEX and 41 diesel engines within that equipment. The annual testing also tested piping and pumps which would be used to supply water from the Pacific Ocean and he reported these tests were performed using the Raw Water Reservoirs at the plant as the source for water and the tests were satisfactory. The plant also completed a recent NRC inspection by the NRC's resident inspection team which found one deficiency due to a piece of wood having been found inside a pipe. Mr. McWhorter reported the FLEX organization at DCPD has taken the position that FLEX equipment should no longer be used to support activities around the station, as by doing so the FLEX equipment may no longer be in a seismically safe location and the environmental permits do not allow use of FLEX equipment for anything other than testing and emergency situations. In lieu of using FLEX equipment, DCPD will rent similar equipment if it is required for back-up purposes. Dr. Budnitz stated he believes it to be an idiotic result that existing FLEX equipment, with proper safeguards, cannot be used to improve safety at the plant. Dr. Peterson remarked in the past the Committee has expressed its frustration with California permitting processes with respect to FLEX' diesel powered pumps and he commented that the permitting process should provide exemptions for use of safety-related equipment in context of nuclear power operations.
- **Safety Fair Observation** - Mr. McWhorter reported a Safety Fair was held in the plant auditorium and was intended to provide displays and to answer employees' questions relative to safety. He reported it was well attended and included participation by DCPD Station Director Mr. Cary Harbor.
- **Crane Program** - Mr. McWhorter reported this was a routine DCISC review of what is a Tier 3 program that, accordingly, no longer has an assigned system engineer and is primarily managed by the Maintenance Department and the Outage organization. He reported generally DCPD's cranes are in good health with the Intake Structure Crane requiring the most

³ FLEX is not an acronym but describes a strategy developed by the nuclear industry to identify diverse and flexible coping strategies to address the loss of safety-related systems due to beyond design basis events.

AGENDA PACKET DRAFT - JANUARY 29, 2019

maintenance which is expected given its location in a harsh marine environment. The DCISC team found the Turbine Building's cranes to be ready for the refueling outage and he observed the Turbine Building's elevators will be used extensively during the 2R21 outage due to the work to rewind of the generator stator. As discussed with the Committee on the previous day, maintenance on the drive coupling on the variable frequency drive for the Unit-2 Polar Crane motor has been deferred. The DCISC fact-finding team found the refueling fuel transfer equipment to be in good condition, with replacement planned during 2R21 for the variable frequency drive controller for the Containment Manipulator Crane. Overall, Mr. McWhorter reported the DCISC representatives found the Crane Program to be effectively implemented.

➤ Reactor Coolant Pump Turning Vane Bolt Cracking - the DCISC found DCPD review of this issue was detailed and he reported for Unit-1 the inspections and actions which would be required if six more effective full power years are to be accumulated on the reactor coolant pumps are not required but these inspections and actions will be required for Unit-2 during its final cycle of operations and this work is being tracked in the Corrective Action Program. The DCISC fact-finding team found response to this issue was appropriate.

➤ Probabilistic Risk Assessment (PRA) Programs - Mr. McWhorter stated the DCISC team reviewed the non seismic PRA programs which have been updated in the last few years and he reported the PRA group has transitioned into a maintenance phase for those programs and is using the results of the PRAs to inform the motor-operated valve risk for the station. He reported there are no current plans to use PRA to inform security or other areas of the station's operations but the PRA group's experience is now being used to support PG&E's activities outside the nuclear context. Dr. Budnitz stated that when reference is made to maintenance in context of PRA this means the PRA models are being maintained and new data entered. Dr. Budnitz reported the PRA group at the plant is generally recognized to be one of the leading PRA groups and the group's models are often used by other PRA groups. Mr. McWhorter reported the DCISC team found DCPD's PRA group continues to do excellent work at the station.

➤ Condensate System - Mr. McWhorter reported this system includes the condenser and the condensate pumps and piping used to pump water from the condenser primarily to supply the main feed pumps. He reported this is a Tier 1 safety-related system with a system engineer assigned. The system health report for the Condensate System is in Green status for both units within minimal seawater leakage into the condenser on both sides. Mr. McWhorter reported the primary issue for both units involves aging of the feedwater heaters which is being monitored to ensure sufficient heat transfer margin remains due to the number of tubes that have been plugged in the feedwater heaters.

➤ Meet with NRC Senior Resident Inspector - Mr. McWhorter reported topics discussed included the FLEX and the PRA Programs.

➤ Refueling Outage 2R21 Safety Plan - Mr. McWhorter reported the Outage Safety Plan provides outage safety check lists to ensure defense-in-depth strategies are maintained during infrequently performed evolutions and transition periods to protect against loss of all AC power.

AGENDA PACKET DRAFT - JANUARY 29, 2019

The Outage Safety Plan uses the Phoenix System, a deterministic risk management system, to maintain an "N+1" or greater defense-in-depth where N is the number of components required to maintain safety, so that N+1 would require maintaining at least two such components. During the 2R21 outage there are three Yellow windows identified by the Phoenix System where defense in depth will be no greater than N+1. The fact-finding team reviewed the unusual evolutions scheduled during 2R21 and found only one such evolution scheduled during 2R21 involving vacuum fill of the primary system which is required due to the occurrence and the timing of the steam generator inspections. In general, Mr. McWhorter reported the Outage Safety Plan for 2R21 was found to be comprehensive and effective. Dr. Budnitz reported primary system vacuum fill has been performed previously by DCPD and was a common practice prior to the replacement of the steam generators.

- Single Point Vulnerabilities Program - Mr. McWhorter reported this program identifies for maintenance purposes critical components that for a single failure could have an impact on the plant. He reported the definitions and requirements for the program have changed in response to NEI Efficiency Bulletin 1625 entitled "Critical Component Reduction." This resulted in a number of components which, if one component was out of service and the other failed, previously constituted a single point vulnerability being removed from the program and these components are now effectively protected by other programs. But Mr. McWhorter reported the definition of single point vulnerability was maintained for single items that could cause a reactor trip, a significant power transient, failure of a mitigating system, affect a performance index component, or cause the loss of a critical safety function. The scope of the Single Point Vulnerability Program was accordingly reduced from approximately 1,500 items to 934 items. Mr. McWhorter reported the DCISC team found the program to be effectively implemented.
- Employee Retention Program - Mr. McWhorter commented a report was presented on this program earlier during this public meeting.
- Meet with DCPD Officer - the DCISC team met with Site Vice President Ms. Paula Gerfen and discussed and received information on the status of the bankruptcy proceedings and the results of the WANO evaluation.

Mr. Tom Marre of Avila Beach was recognized. Mr. Marre remarked the DCISC needs to receive frequent updates on the PG&E bankruptcy situation as that situation could change daily.

Mr. David Weisman of the Alliance for Nuclear Responsibility was recognized. Mr. Weisman stated he was looking forward to the presentation later in this public meeting on the status of programs to monitor human performance and trends in human performance. He reported that PG&E employees get information from the media which may have a devastating impact and it is necessary to address how the psychological welfare of the DCPD workforce is faring during what he stated is a trying time for the company. Dr. Budnitz replied when the DCISC conducts fact-finding the DCISC representatives avail themselves of the opportunity to

AGENDA PACKET DRAFT - JANUARY 29, 2019

interact and discuss issues with DCPD employees and the Committee remains attuned to issues of employee morale. Mr. Weisman commented when he toured DCPD with a CPUC sponsored tour group on the morning of the PG&E bankruptcy announcement he observed there was also a DCISC fact-finding team touring at work in the plant.

Following a motion by Dr. Budnitz seconded by Dr. Peterson the September 11-12, 2019 Fact Finding Report was accepted by the Committee.

XXV ADJOURN MORNING MEETING

The Chair adjourned the morning meeting of the Committee at 12:05 A.M.

XXVI RECONVENE FOR AFTERNOON MEETING

The October 24, 2019 afternoon session of the Diablo Canyon Independent Safety Committee was called to order by its Chair, Dr. Peter Lam at 1:00 P.M. Dr. Lam welcomed those persons present in the audience and those watching the proceedings on livestreaming video. Dr. Lam requested any of the members who wished to make remarks to do so at this time.

XXVII COMMITTEE MEMBER COMMENTS

There were no comments by Members at this time.

XXVIII PUBLIC COMMENTS AND COMMUNICATION

The Chair reviewed the invitation to address the Committee on matters not on the agenda for this public meeting and he invited any comments from members of the public who wished to address the Committee to do so now. There was no response to his invitation.

XXIX INFORMATION ITEMS BEFORE THE COMMITTEE (Cont'd.)

Dr. Lam requested Mr. Baldwin to introduce the next presentation.

Mr. Baldwin introduced Mr. Matt Hayes Director of Organizational Effectiveness, Performance Improvement and Learning Services at DCPD and reported Mr. Hayes has been with PG&E for three years and has been employed for many years within the nuclear industry in positions of increasing authority. Mr. Baldwin stated Mr. Hayes has worked at four nuclear power plants and has a broad range of experience including knowledge of best practices at other stations

Current Status of Programs that Monitor Human Performance and Trends in Human Performance.

Mr. Hayes displayed what he termed the performance improvement model for DCPD and described the model as focused upon open and transparent communications, spending time on performance monitoring and identification of issues at the lowest possible level, analyzing, identifying and planning solutions, and implementing solutions developed at the lowest possible level. He reported performance improvement elements include the Corrective Action Program, self-assessment, benchmarking, the use of operating experience, human performance monitoring

AGENDA PACKET DRAFT - JANUARY 29, 2019

and trending, the use of human performance tools, and field observation and coaching.

Mr. Hayes described the Corrective Action Program, which is required by 10 CFR Part 50, as a program for employees to find and identify issues or concerns which are then entered into the Corrective Action Program in a number of ways to document the identified issue. An assessment is performed for each issue for its risk evaluation level and the issue is assigned to an owner for a solution. Follow up is provided to the originator of the issue when all actions in response have been completed. He reported the nuclear industry has recently taken the initiative to streamline corrective action programs and DCPD has implemented those initiatives. Mr. Hayes displayed a timeline for the Corrective Action Program which provides for immediate screening by the Operations shift manager for operational impacts, and subsequently within 24 hours of initiation of the concern review by a panel of subject matter experts from the Operations, Maintenance, Engineering and Training organizations. The issue is assigned a significance level and an analysis type and is reviewed by senior leadership and the concern then proceeds to the investigation, evaluation and corrective action stages. Level 1 significant issues are generally assigned a root cause evaluation, with Significance Level 2 issues assigned a cause evaluation, and Significance Level 3 issues are assigned a work group evaluation.

Mr. Hayes reported DCPD assesses its performance through use of self-assessment which employs structured methods for reviewing activities and identifying any gaps to excellent performance. Gaps are entered into the Corrective Action Program. He reported 21 formal self-assessments were performed at DCPD during 2019 and this number does not include “quick hit” assessments or informal self-assessment.

Mr. Hayes described benchmarking as DCPD’s program to send personnel into the nuclear or the non nuclear industry and sometimes to other business lines within PG&E to identify best practices. He reported a recent benchmarking visit was conducted to review the confined space programs of other industries. During Mr. Hayes reported during 2018-2019 there have been 29 benchmarking visits conducted to date.

Mr. Hayes reported DCPD also reviews operating experience received from other stations and evaluates and shares lessons learned with the industry through the Operating Experience Program. In 2019 a total of 418 external operating experiences were reviewed by DCPD which number does not include those generated by DCPD.

Mr. Hayes reported performance monitoring and trending is facilitated by the Performance Improvement (PI) group he leads and the PI group reviews Corrective Action Program data, observations by employees or supervisors and safety and human performance events. The PI group uses analysis of metrics to try to predict current and future performance and to identify emerging trends at the lowest level possible. He reported the senior leadership team reviews daily the Notifications generated within the Corrective Action Program from the previous day and the assignment of trending codes. In response to Consultant Wardell’s inquiry Mr. Hayes reported that Notifications that are classified as “DA” represent conditions adverse to quality and are assigned a significance level of 1, 2 or 3 and an evaluation type is assigned accordingly. A Notification assigned a “DN” classification represents a condition which is not

AGENDA PACKET DRAFT - JANUARY 29, 2019

adverse to quality and these are also assigned a priority level of between 1 and 5. Mr. Baldwin remarked that equipment problems are also assigned DN levels of between 1 and 3 which drives the work process for getting the equipment repaired.

Mr. Hayes reported all DCPD employees are trained in the use of multiple human performance tools and leadership conducts observations in the field to verify employees are properly employing these tools in their daily work. Human performance tools include the site standards handbook, pre job briefings, procedure use and adherence techniques, correct component verification techniques and are intended to make sure employees are fully engaged in the task at hand. Roles and responsibilities are assigned to the teams working in the plant and time is taken to look for any hazards or unexpected conditions before performing work. Mr. Hayes displayed and described a photo of an employee using some of the human performance tools.

Mr. Hayes stated field engagement and coaching efforts are focused on checking in with employees rather than checking on them to make sure employees have the tools needed to do a job safely. The PI group has recently engaged with craft level supervisors during observation review meetings to assist the supervisors by reducing the burden on the supervisors of recording observations made in the field and this effort has resulted in higher quality observations and better data for use in trending and for organizational learning opportunities. In response to Dr. Lam's query Mr. Hayes stated first-level supervisors meet every two weeks and these observation review meetings are chaired by the department manager. Once every month the manager groups will report out on the observation review meetings to the directors.

In summarizing his presentation Mr. Hayes stated the Performance Improvement Program at DCPD is effective and process simplification has been undertaken to align the program with the industry. By making the use of human performance tools easier it has been possible to capture learning at lower levels and as a result station performance has improved over a period of the last six to nine months. Self-assessments ensure DCPD is aligned with its established guidelines and benchmarking ensures DCPD standards are among the best in the industry. He reported human performance tools are effective in reducing error and trend analysis and field engagement is taking place. In response to Consultant Wardell's inquiry concerning human performance trends Mr. Hayes replied during the 2R21 refueling outage DCPD is seeing twice as many organizational learning opportunities than in 1R21 which Mr. Hayes attributed to the workers' increased use of human performance tools when using procedures and, accordingly, the initiation of a greater number of Notifications when some procedures are found to be less than clear. Mr. Hayes responded DCPD is now placing a heavy focus on procedural use and adherence in the field by non licensed operators and is conducted paired observations and encouraging use of the Corrective Action Program. In response to Dr. Budnitz' question Mr. Hayes reported the Performance Improvement group currently has a staff of 13 persons, some of whom are union members and some of whom are non union, consisting of, in addition to Mr. Hayes, one full time station human performance coordinator, nine performance improvement coordinators, one supervisor and one manager, with a performance improvement coordinator assigned to each DCPD department. In response to Dr. Budnitz' further inquiry Mr. Hayes stated

AGENDA PACKET DRAFT - JANUARY 29, 2019

his opinion that the Performance Improvement group staffing level is presently adequate and that there are other organizations including all levels of management and the Quality Department and the Training Department which participate in the Corrective Action Program processes together with the Performance Improvement group.

Mr. David Weisman of the Alliance for Nuclear Responsibility was recognized. Mr. Weisman inquired whether there would be a presentation to the DCISC by DCPD at what he termed the macro level concerning general morale and employee satisfaction in context of the ongoing PG&E bankruptcy situation. He observed that it is not known what announcements may be made between now and June 30, 2020 when he reported a bankruptcy exit plan needs to be finalized and planning may be needed to cope with employee morale and social impacts as the metrics discussed by Mr. Hayes may reflect improvement on a micro level while panic could prevail at a macro level. He observed the International Brotherhood of Electrical Workers Union recently shifted its allegiance from PG&E's current stockholders to the Elliott Hedge Fund Bondholders Group. Mr. Hayes responded the performance improvement coordinators who are union members are members of the of the Engineers & Scientists of California. Mr. Hayes also reported there is a Nuclear People Health Committee that is watching for signs of distractions or worker disengagement and there a safety culture survey will be taken in November 2019. Mr. Garcia commented the plant also employs a Safety Culture Monitoring Panel with its main focus to ensure DCPD employees are engaged and focused. Dr. Budnitz reported the DCISC has observed a meeting of the Nuclear People Health Committee and found the committee's engagement at the manager level to be effective. Mr. Hayes commented staffing and succession plans are in place and are cognitively assessed by the Nuclear Safety Culture Monitoring Panel which is within Mr. Hayes' organization. Dr. Lam stated he appreciated Mr. Hayes' comments but he shares Mr. Weisman's concern as morale is an exceptionally difficult area to assess and ultimately it is human performance that drives reactor safety.

Dr. Lam thanked Mr. Hayes for his presentation.

Mr. Baldwin introduced the final presenter for this public meeting, Mr. Philippe Soenen, DCPD Decommissioning Environmental and Licensing Manager. He reported Mr. Soenen holds degree in mechanical engineering and has 17 years' experience in the nuclear field, most of that experience with PG&E projects including the DCPD and HBPP Independent Spent Fuel Storage Installation (ISFSI) licensing issues.

Update on Plans for Relicensing of the Independent Spent Fuel Storage Installation (ISFSI).

Mr. Soenen reported in 2004 DCPD received a 20-year license from the NRC for operation of its ISFSI. Accordingly, in 2009 DCPD began the transfer of spent nuclear fuel from wet to dry storage and to date has the plant conducted seven such loading campaigns with 58 casks, each containing 32 fuel assemblies, now stored at the ISFSI. Mr. Soenen reported the NRC license for the ISFSI is site-specific and by NRC regulation a site-specific license requires submittal of a license renewal application at least two years prior to expiration of the license and accordingly DCPD is required to submit its application to renew the ISFSI license in 2022. Funding in the amount of \$14 million to prepare and submit the ISFSI license renewal

AGENDA PACKET DRAFT - JANUARY 29, 2019

application including for the required inspection activities to validate existence of operating experience has been requested in the current General Rate Case and PG&E is awaiting a decision in that proceeding. Mr. Soenen stated part of the ISFSI relicensing application process requires the use of Aging Management and Maintenance plans for the major components of the ISFSI. The NRC has provided regulatory guidance for this effort in NUREG 2214 which Mr. Soenen stated was issued earlier in 2019.

In response to Consultant McWhorter's question Mr. Soenen reported the Holtec firm has submitted a license renewal application for its generic HI-STORM spent fuel storage system and DCPD is monitoring the status of the Holtec license renewal application as the principal focus of that renewal application is on Holtec's aging management programs. Mr. Soenen replied in response to Consultant McWhorter's inquiry that the issue of chloride induced stress corrosion cracking for stainless steel components is being addressed through additional research including American Society of Mechanical Engineers (ASME) code cases, as the NRC has determined that this type of aging mechanism would be ongoing on at such a slow rate that time is being allowed to keep within certified inspection criteria and Mr. Soenen stated the process for dealing with this mechanism is to keep abreast of industry standards and to implement the ASME codes as they are approved. He confirmed Mr. McWhorter's observation that this requires commitment to a program for which the standards are still in development. Mr. Soenen confirmed Dr. Budnitz' comment that aside from seismic considerations and the configuration of the DCPD Cask Transfer Facility there is much similarity between the issues being addressed in the Holtec generic license renewal application and DCPD's site-specific renewal request and Dr. Budnitz observed Holtec's experience with the regulatory process should provide DCPD with valuable information. Mr. Soenen observed it is the planning for safe inspection during the pre-application phase that is the most time consuming portion of the application process and a pre application inspection was performed at the Humboldt Bay Power Plant ISFSI in collaboration with the Electric Power Research Institute (EPRI) and while DCPD and HBPP use different systems the inspection techniques that will be required at DCPD are similar. In response to Dr. Budnitz' query Mr. Soenen stated although knowledge has increased the seismic licensing basis for the HBPP has not changed.

In response to Dr. Lam's inquiry Mr. Soenen confirmed in context of his discussion of license renewal for DCPD that he was referring to license renewal for the existing casks for an additional 20-year period. Mr. Soenen confirmed Dr. Lam's observation that the use of a different type of cask would require a separate license application, incorporation into the existing license, or possibly a general license for a different system.

Mr. Soenen reported in its final decision in the 2015 NDCTP the CPUC determined for cost estimating purposes that seven years cooling time for spent nuclear fuel was sufficient. He confirmed Dr. Lam's observation that this is in contrast to the requirements of present storage system used at DCPD which per the system's design basis thermal and burn-up limitations requires a minimum of ten years to sufficiently cool spent fuel. Mr. Soenen reported there have been systems developed with greater capabilities than the system currently in use at DCPD and part of the 2015 NDCTP decision required PG&E to assess what the cost tradeoffs for the

AGENDA PACKET DRAFT - JANUARY 29, 2019

impacts would be if both pre shutdown and post shutdown fuel transfer from wet to dry storage was accelerated. He reported PG&E performed the required evaluation and has determined it is feasible and safe to move fuel from wet to dry storage within seven years but there are tradeoffs in how the spent fuel pools are emptied. Mr. Soenen reported DCCP could minimize the inventory in the pools at any given time but in doing so the duration before the pools could be fully emptied is increased. Alternatively, the inventory in the pools can be increased for a shorter duration with the result that the pools would be emptied sooner.

Mr. Soenen confirmed Dr. Lam's observation that any plan to use the existing cask system will require ten years to offload the spent fuel pools and any plan for a shorter duration will require the use of a different system. Mr. Soenen reported additional research and analysis needs to be done through a request for proposals to be issued by PG&E and concerning which the California Energy Commission will have input. Mr. Soenen stated PG&E has now satisfied the requirements from the 2015 NDCTP in its filings in the 2018 NDCTP by performing the evaluation he discussed which found, with the tradeoffs he reviewed, that it is safe and feasible to move the fuel from wet to dry storage within seven years. He remarked there is also interplay during decommissioning between moving the fuel and the need to provide storage for greater than Class C waste produced through activities such as segmenting the reactor vessels. Dr. Peterson stated it was his understanding the federal Department of Energy has agreed to accept greater than Class C waste when it is packaged in the same manner as spent fuel, that is, within canisters. Mr. Soenen replied he was not certain as to that agreement but he stated greater than Class C waste does not have the same residual heat limits as nuclear fuel and would not produce any technical challenges beyond those posed by spent fuel and disposal of greater than Class C disposal will be part of the request for proposals PG&E is preparing to issue for a new spent fuel storage system capable of transferring fuel from wet to dry storage in a period not to exceed seven years. The request for proposals will also require vendors to provide information on the licenses the vendors are prepared to provide for their systems. In response to Dr. Peterson's inquiry Mr. Soenen stated the request for proposals will include guidance that any new system should propose to stay within the footprint of the existing ISFSI, potentially with modifications to the rings and anchoring studs, but if a proposal is submitted which provides for building another facility the proposal would need to include information on the cost and the regulatory approvals required.

Mr. Soenen provided a graph used in the 2018 NDCTP showing the various scenarios proposed for the time required to empty the spent fuel pools after the plant shuts down, including the ten-year period required under the current technical specifications, the expedited proposal offered as part of the 2018 NDCTP which requires using a new spent fuel storage system design with a total heat load capacity that is greater than the current design and with higher limits for individual fuel assemblies, and for a scenario of collecting a larger inventory in the pools and stopping transfer of any fuel until post-shutdown so as to be able to offload the pools as quickly as possible. The graph also showed the evaluation done if pre shutdown fuel transfer from wet to dry storage is accelerated so as to draw down spent fuel pool inventory as quickly as possible using a new spent fuel system design and the safety regulation limits imposed by the post 9-11 NRC's B.5.b. regulation to address a catastrophic event that could result in the

AGENDA PACKET DRAFT - JANUARY 29, 2019

emptying of a spent fuel pool. [Section B.5.b of the NRC issued “Order for Interim Safeguards and Security Compensatory Measures” dated February 25, 2002, issued as a result of the terrorist events of September 11, 2001 (EA-02-026).]

Dr. Peterson observed that within one year after final core offload heat generation in offloaded fuel is below a level that would require or need additional fuel assemblies required by B.5.b. for cooling and offloading fuel from the core within one year following shutdown should not be subject to B.5.b. requirements. Mr. Soenen agreed with Dr. Peterson’s assessment but he commented at that point in time one would be potentially moving the end date out for emptying the spent fuel pools because it would be necessary to wait for the hottest fuel to cool longer. In response to Dr. Peterson’s query as to whether storing hotter fuel for some period of time may degrade the fuel more than if it were loaded within casks with lower heat load than the current design Mr. Soenen replied that the EPRI has provided information that DCP’s modeling has been overly conservative such that there is greater margin available within the heat load parameters and regarding the degradation that could be foreseen by the long term storage of the fuel. Dr. Peterson observed that vacuum drying of spent fuel which can raise the temperature of the fuel beyond what it experiences in service in the reactor can cause severe thermal transients that can affect its degradation, but Dr. Peterson reported the vacuum drying method has never been used by DCP.

In response to Dr. Budnitz’ question Mr. Soenen replied the Nuclear Waste Policy Act assumes five-years of cooling to be required for spent fuel and the cost for fuel storage after that period is primarily a cost to the federal taxpayers. Dr. Budnitz observed, and Mr. Soenen agreed, accordingly while DCP’s decision-making is driven by several imperatives in its plans for moving spent fuel from wet to dry storage the cost to PG&E for the differing scenarios discussed by Mr. Soenen is not a factor.

Mr. Soenen reported PG&E is working with the UCLA Risk Institute on a study associated with the various scenarios for moving fuel from wet to dry storage and for the ability to accelerate the pre shutdown or post shutdown movement of fuel including making a comparison of the risks associated with any of the scenarios that will potentially be created by the responses to the request for proposals received from vendors. This study is presently under review, with Phase I expected to be finalized in October-November 2019 period and the request for proposals process initiated by PG&E sometime before the end of 2019. He reported PG&E’s next update on this matter will be in context of the 2021 NDCTP when bids received from vendors will have been evaluated so as to provide more information on the cost associated with a new system and the approvals required. Mr. Soenen displayed a timeline through 2025 showing the proposed schedule for these activities. He remarked in this matter PG&E is working with the California Energy Commission on technical aspects to ensure all the Energy Commission’s concerns will be addressed in the request for proposals for a new storage system and is expecting to issue a purchase order for such a system prior to the 2021 NDCTP. **Mr. McWhorter commented that the DCISC expects to have the opportunity to review the UCLA study during its upcoming December 2019 fact-finding visit.** Mr. Soenen identified issues under consideration in the request for proposals as including:

AGENDA PACKET DRAFT - JANUARY 29, 2019

- Cask inspectability/aging management.
- Radiation dose as low as reasonably achievable for workers and the public.
- Heat load limits.
- Seismic design.
- Compatibility with existing components.

Dr. Lam's stated with reference to licensing of new casks DCP's schedule appears to him to be very ambitious as is PG&E's plan to issue a purchase order prior to obtaining a license for a new storage system. Mr. Soenen replied and stated this depends upon how unique the cask design may be, with a variation of an existing or previously approved system potentially accelerating the licensing process but he agreed with Dr. Lam that with a start-over new design the schedule would be very aggressive.

Mr. Tom Marre, a resident of Avila Beach was recognized. Mr. Marre stated he found Mr. Soenen's presentation to be interesting but vague.

Mr. David Weisman of the Alliance for Nuclear Responsibility was recognized. Mr. Weisman suggested that more detailed information concerning the subjects discussed by Mr. Soenen could be found in the publicly available transcripts of testimony in the 2018 NDCTP. Mr. Weisman inquired whether there is a possible exemption from the requirements of B.5.b. after fuel has cooled for 18 months or more. Mr. Weisman commended the Committee's attention to the testimony in the 2018 NDCTP of the Alliance for Nuclear Responsibility which he reported is now available on the Alliance's website at www.a4nr.org. Mr. Weisman remarked it was his impression the involvement of the California Energy Commission has come rather sudden and late in the process as the 2015 NDCTP had an ordering paragraph requiring PG&E to coordinate with the Energy Commission starting in 2016 but the first meeting cited in the evidentiary hearings did not take place until early December 2018 just prior to PG&E filing its Application in the 2018 NDCTP. Dr. Lam observed that over the past decade the California Energy Commission has been an active participant in the endeavor to move spent fuel from wet to dry storage.

XXX CONCLUDING REMARKS & DISCUSSION BY COMMITTEE MEMBERS OF FUTURE DCISC ACTIVITIES

In response to Dr. Budnitz' inquiry, Mr. Garcia confirmed that the dates proposed earlier in this public meeting for fact-finding and future public meetings were acceptable to PG&E.

Dr. Lam expressed the Committee's appreciation to the members of the public who attended and participated in this public meeting and also to the senior management of PG&E including Business Operations Director Mr. Tom Baldwin and CNO Manager Mr. Hector Garcia and their colleagues. The Chair also expressed the Committee's appreciation to the technicians of AGP Video who provided audio and visual recording and programming services for this public meeting.

AGENDA PACKET DRAFT - JANUARY 29, 2019

XXX ADJOURNMENT OF NINETY-FOURTH PUBLIC MEETING

There being no further business the ninety-fourth public meeting of the Diablo Canyon Independent Safety Committee was then adjourned by its Chair, Dr. Peter Lam, at 2:20 P.M.

DIABLO CANYON INDEPENDENT SAFETY COMMITTEE

AGENDA TRANSMITTAL FORM

MEETING DATE:	February 12, 2020
AGENDA ITEM:	V-A
AGENDA TITLE:	DCISC Receipt of PG&E's Response to its Twenty-Ninth Annual Report on Safety of Diablo Canyon Operations; July 1, 2018 - June 30, 2019

CONSENT ☐ ACCEPTANCE ☒ INFORMATION ☐

The Restated Charter for the DCISC approved by the California Public Utilities Commission in Decision 07-01-028 provides:

“The Committee shall prepare an annual report and such interim reports as it deems appropriate, which reports shall include any recommendations of the Committee. The report shall be submitted first to PG&E, and PG&E shall respond in writing within 45 days. PG&E's response is then included with the Annual Report”.

The Committee made no recommendations in its Twenty-Ninth Annual Report for the period July 1, 2018 – June 30, 2019.

RECOMMENDED COMMITTEE ACTION:

Motion to accept PG&E's Responses to the DCISC's Twenty-Ninth Annual Report.



**Pacific Gas and
Electric Company**

James M. Welsch
Senior Vice President
Generation and
Chief Nuclear Officer

Diablo Canyon Power Plant
P.O. Box 56
Avila Beach, CA 93424

805.545.3242
E-Mail: JMW1@pge.com

November 21, 2019

PG&E Letter ISC-19-001

Dr. Peter Lam
c/o The Diablo Canyon Independent Safety Committee
857 Cass Street, Suite D
Monterey, CA 93940

Response to the Diablo Canyon Independent Safety Committee Twenty-Ninth
Annual Report on the Safety of Diablo Canyon Power Plant Operations - July 1,
2018, to June 30, 2019

Dear Dr. Lam:

On November 15, 2019, Pacific Gas and Electric Company (PG&E) received the Diablo Canyon Independent Safety Committee's (DCISC) Twenty-Ninth Annual Report on the Safety of Diablo Canyon Operations for the period of July 1, 2018, to June 30, 2019.

We are pleased that the DCISC has once again concluded that PG&E operated Diablo Canyon Power Plant (DCPP) safely and has no recommendation during this report period.

As you are aware, operating the plant conservatively to protect public health and safety is our highest priority, and we will continue to ensure that we fulfill this commitment.

We welcome the DCISC independent review and oversight, which contributes to the continued safe operation of DCPP.

Sincerely,

James M. Welsch
Senior Vice President, Generation and Chief Nuclear Officer

cc/: Dr. Robert J. Budnitz
Dr. Peter Lam
Dr. Per F. Peterson
Richard McWhorter
Robert W. Rathie
Ferman Wardell

DIABLO CANYON INDEPENDENT SAFETY COMMITTEE

AGENDA TRANSMITTAL FORM

MEETING DATE:	February 12, 2020
AGENDA ITEM:	V-B
AGENDA TITLE:	Update on Financial Matters and DCISC Activities During 2020

CONSENT []

ACTION []

INFORMATION [X]

Staff Summary: It is expected that the Committee Members will hold a discussion regarding Committee financial matters and DCISC planned activities during the 2020.

The Actual and Proposed DCISC Fact-Finding and Public Meeting Items, with Key Dates, prepared by Committee Consultant Ferman Wardell is provided for your use in reviewing and planning Committee activities.

RECOMMENDED COMMITTEE ACTION: As appropriate

DCISC Fact-Finding and Public Meeting Agenda Items for 2019-2020

July 23-24, 2019 Fact-finding Meeting (PFP, RDM) (AR Exhibit D.1)

1. Refueling Outage 1R21 Issues
2. Annual Radiological Release Report and Annual Radiological Environmental Monitoring Report
3. Training Program for Temporary Outage Workers
4. Individual Radiation Exposures During Outages
5. Meet with DCPD Officer
6. Recent Modifications to Reactor Coolant Pump Vibration Monitoring Systems
7. Safety/Security Interface Program
8. Meet with Nuclear Regulatory Commission (NRC) Resident Inspector
9. Buried Tanks and Piping Program
10. Systems Engineering Department Update

August 21-22, 2019 Fact-finding Meeting (PL, RFW) (AR Exhibit D.2)

1. Meet with Nuclear Regulatory Commission (NRC) Senior Resident Inspector
2. Operational Decision Making
3. Quality Verification Assessment of Abnormal Operations Procedures
4. Spent Fuel Management
5. Containment Spray System
6. Safety Systems Functional Failures
7. Refueling Outage 2R21 Preview
8. Meet with DCPD Site Vice-President Paula Gerfen
9. Nuclear Safety Culture
10. 2019 World Association of Nuclear Operators Evaluation Results
11. Meet with San Luis Obispo County Director of Emergency Services

September 11-12, 2019 Fact-finding Meeting (RJB, RDM) (AR Exhibit D.3)

1. Operations Shift Turnover Briefing
2. As Low As Reasonably Achievable (ALARA) Review Committee Meeting
3. FLEX Program
4. Safety Fair Observation
5. Crane Program
6. Reactor Coolant Pump Turning Vane Bolt Cracking
7. Probabilistic Risk Assessment Programs
8. Condensate System
9. Meet with Nuclear Regulatory Commission (NRC) Senior Resident Inspector
10. Refueling Outage 2R21 Safety Plan
11. Single Point Vulnerabilities Program
12. Employee Retention Program
13. Meet with DCPD Officer

October 23-24, 2019 Public Meeting (AR Exhibit B.3)

1. State of the Plant including Key Events, Highlights, Organizational Changes and Station Activities since DCISC's June 2019 Public Meeting
2. Plans for Future Staffing through the Cessation of Operations; Including Current Staffing Numbers and Trends, Recruitment of New Employees, Results of the Tranche 2 Retention

- Agreement Enrollment, and Future Professional Development Opportunities
- 3. Committee Comments and Receive Comments from Members of the Public Regarding a Potential Role for the DCISC to Review Nuclear Fuel-Related Issues After Expiration of the DCPD Operating Licenses
- 4. Update on the Status of NRC Performance Indicators, Licensee Event Reports, NRC Inspection Reports and Notices of Violation, Issues Raised by NRC Resident Inspectors, and Major Regulatory Issues (Open Compliance Issues and License Action Requests).
- 5. Decommissioning Planning Update
- 6. Current Status of Programs that Monitor Human Performance and Trends in Human Performance
- 7. Update on Plans for Relicensing of the Independent Spent Fuel Storage Facility

November 6-7, 2019 Fact-finding Meeting (RJB, RFW) (AR Exhibit D.4)

- 1. Meet with NRC Senior Resident Inspector
- 2. Meet with DCPD Officer
- 3. Reactivity Management (last reviewed April 2018)
- 4. System Review: Containment Structure (last reviewed September 2016)
- 5. Plant Health Committee meeting
- 6. Engineering Excellence Plan (last reviewed December 2018)
- 7. August 2019 WANO evaluation report
- 8. Plant Tour: 2R21 outage activities and observe work in progress
- 9. View Recorded September 3, 2019 Listening and Learning with Jim Welsch, Paula Gerfen, and CEO Andy Vesey - perhaps during lunch.
- 10. Discuss the following for appropriateness:
 - DCPD experienced two significant avoidable issues during Refueling Outage 1R21 which were caused or exacerbated due to ineffective implementation of its Corrective Action Program. These issues were Reactor Coolant Pump seal leakage and Polar Crane Trip Reset. Although neither issue was a major safety concern, each increased the risk of an accident. The DCISC believes it prudent for DCPD to examine its Corrective Action Program, including corrective action effectiveness reviews, for ineffective implementation extent of condition.
- 11. Update on the results of the following:
 - QV Assessment 191420002, OP AP-34 Series Fire Protection Abnormal Operating Procedures - results of Operations Procedure Group review of the 91 P-34 Series fire protection procedures.

December 11-12, 2019 Fact-finding Meeting (PFP, RDM) (AR Exhibit D.5)

- 1. Meet with Nuclear Regulatory Commission (NRC) Senior Resident Inspector
- 2. Cause Evaluation and Corrective Actions for Inadvertent Unit 2 'F' Bus Transfer
- 3. Intake Structure General Condition and Walkdown
- 4. Meet with DCPD Officer
- 5. Future Spent Fuel Management
- 6. Residual Heat Removal Systems
- 7. Transmission System and Unit 2 Reactor Trip Corrective Actions
- 8. Control Room Observation During Startup
- 9. 'T+1' Critique Meetings
- 10. Refueling Outage 2R21 Performance

January 29-30, 2020 Fact-finding Meeting (PL, RFW) (AR Exhibit D.6)

1. Attend Plant Health Committee Meeting
2. Maintenance Department Update and PIs
3. Troubleshooting
4. Maintenance Work Package
5. Generator Stator Refurbishment Video
6. Observe Training Session
7. Meet with NRC Senior Resident Inspector
8. Unexpected Energy Release
9. 4kV Relay Replacements
10. Meet with DCPD Officer
11. PRA Calculation: "Transition from Mode 5 to Mode 4 with Main Bank 500kV Unavailable."

February 12-13, 2020 Public Meeting (AR Exhibit B.6))

1. State of the Plant Update including Key Events, Highlights, Organizational Changes, Update on PG&E Bankruptcy and any effect on Current and Future Operations, and Station Activities since DCISC's October 2019 Public Meeting
2. Performance During the 21st Refueling Outage for Unit 2 (2R21) including Generator Stator Refurbishment, Key Activities, Performance Indicators, Results Achieved, Fuel and Steam Generator Inspection Results, Unexpected Equipment Issues and Open Items.
3. San Luis Obispo County Offices of Emergency Services Update on Emergency Preparedness Programs
4. Quality Verification Organization's Perspective on Plant Performance, Quality Verification's Top Issues, and the Latest Quality Performance Assessment Report (QPAR).
5. Current Status of Programs that Monitor Human Performance, Human Performance Indicators and Trends in Human Performance (including Personnel Error, Mispositioning, Station and Department Level Events and Safety Incidents
6. Results of the 2019 Operating Plan and Key Elements of the 2020 Operating Plan.

March 17-18, 2020 Fact-finding Meeting (RJB, RDM) (AR Exhibit D.7)

April 15-16, 2020 Fact-finding Meeting (PL, RFW) (AR Exhibit D.8)

May 12-13, 2020 Fact-finding Meeting (PFP, RDM) (AR Exhibit D.9)

July 1-2, 2020 Public Meeting (AR Exhibit B.9)

July 21-22, 2020 Fact-finding Meeting (PFP, RFW) (AR Exhibit D.1)

August 19-20, 2020 Fact-finding Meeting (PL, RDM) (AR Exhibit D.2)

September 1-2, 2020 Fact-finding Meeting (RJB, RFW) (AR Exhibit D.3)

September 30 – October 1, 2020 Public Meeting (AR Exhibit B.3)

November 9-10, 2020 Fact-finding Meeting (RJB, RDM) (AR Exhibit D.4)

December 8-9, 2020 Fact-finding Meeting (PFP, RFW) (AR Exhibit D.5)

January 27-28, 2021 Fact-finding Meeting (PL, RDM) (AR Exhibit D.6)

February 16-17, 2021 Public Meeting (AR Exhibit B.6)

DCPP 2019-2020 Key Dates

NSOC Meetings (DCISC invited only to the 2-hour exit meeting on the final day, Thursday)

February 24, 2020 [1/30/20: NSOC 12:30 – 2:30pm]

June 15, 2020

November 16, 2020

Refueling Outages

1R22 October 4 – November 13, 2020

2R22 April 25 – May 28, 2021

Emergency Preparedness

3/5/2020 – Delta Team in Facility Training and S2

3/12/2020 – Alpha Team in Facility Training and S2

3/26/2020 – Bravo Team in Facility Training and S2

4/9/2020 – Charlie Team in Facility Training and S2

7/22/2020 – Alpha Team Dress Rehearsal

8/19/2020 – Alpha Team NRC Evaluated Exercise

12/2/2020 – Charlie Team Full Scope Drill

DIABLO CANYON INDEPENDENT SAFETY COMMITTEE

AGENDA TRANSMITTAL FORM

MEETING DATE:

February 12, 2020

AGENDA ITEM:

V-C

AGENDA TITLE:

Consideration of Issues on the
Open Items List

CONSENT []

ACTION [X]

INFORMATION [X]

Staff Summary: It is anticipated that the committee will hold discussion concerning the items appearing on its Open Items List prepared by Committee Consultant FermanWardell.

RECOMMENDED COMMITTEE ACTION: As appropriate, review and provide direction.

Diablo Canyon Independent Safety Committee Open Items List – 2019-2020

Open Item Type: **M= Monitor** **F = Follow-up** **I = Issue** Items in *Red Italics* are new or revised

ITEM NO.	TYPE	OPEN ITEM CATEGORY/DESCRIPTION	Last Actions	Next Action
CO		Conduct of Operations (CO)		
CO-7	M	Review DCCP storm response experience and strategy every two years [or as necessary] during or after annual winter storm season.	4/15FF 5/17FF	As necessary
CO-8	M	Monitor all reactor trips – automatic and manual (review trip LERs at public meetings). [Reviewed Dec. 2, 2018 Unit Reactor 2 trip and root cause at 12/18FF, 1/19FF, 3/19FF, <i>and 6/19PM</i> – satisfactory.]	6/19PM <i>12/19PM</i>	Post-trip FFs & PMs
CO-9	F	Reactivity Management – review every 18 months. [Reviewed Reactivity Management 5/16FF, 4/18FF, and <i>11/19FF</i> – satisfactory.]	List at end of OIL 11/19FF	Regularly <i>2Q21FF</i>
CO-10	M	Mispositioning Errors (Equipment Status) – monitor the status of mispositioning errors and actions to resolve. [Reviewed at 11/15FF – satisfactory.] [Reviewed QV assessment of 2R20 outage. Some mispositioning issues. Follow up on resolution.] [Reviewed 7/18FF – satisfactory.]	11/15FF 4/18FF 7/18FF	<i>3/20FF</i>
CO-11	M	Operator concerns and issues – review periodically the status of operator concerns and issues. [Reviewed Ops Human Performance & Ops Excellence Plan 8/16FF – satisfactory.] [Reviewed Ops Dept. performance 12/17FF – sat.] The DCISC team concluded [2/18PM] plans are in place to address areas identified for improvement in the Operations Department and the DCISC should continue to review Operations Department performance on a regular basis. [Reviewed Operations Dept. performance in 12/18FF – satisfactory.]	8/16FF 12/17FF 12/18FF	<i>3/20FF</i>
CO-13	M	Review any implementations of the CAISO load following policy that result in DCCP transients. Review any initiatives to operate DCCP in different modes, such as load following due to renewable energy fluctuations, during its final years of operation. Include 230kV voltage stability issues. Dr. Peterson observed there is potential that an increase in the risk of transmission problems or outages might affect the availability of alternate off site power sources for DCCP due to increasing incentives to curtail power output because of production or grid-related reasons. Mr. Peck and Dr. Peterson agreed this might be a suitable topic for a future DCISC fact-finding which should include representatives from the PG&E transmission organization. [Reviewed at 5/19FF – satisfactory.] [Reviewed 12/19FF, including Public Safety Power Shutoff Program.]	5/19FF 12/19FF	<i>1Q21FF</i>
CO-14	F	The DCISC team found the operator retention project to be effectively managed but the Committee should follow this issue closely with reference to licensed operators and well as the station in general. [Reviewed Operator License Class plans 1/19FF – satisfactory.]	3/18FF 1/19FF 9/19FF	<i>4Q20FF</i>

February 12-13, 2020 Public Meeting
2/3/20

FF = Fact-finding Meeting

PM = Public Meeting

Q=Quarter

CM		Conduct of Maintenance (CM)		
CM-7	I	Review PG&E's progress in complying with (1) the amendment to 10CFR50.55a, which provides the requirements for ISI of containment structures (degradation) and (2) ASME Code requirements for steel liner weld inspections.	7/12FF 8/17FF 11/19FF	Each Pair of RFOs 3Q21FF
CM-10	M	On-line Maintenance: review the implementation of on-line maintenance bi-annually, including the 12-week Rolling Maintenance Schedule about how well it is working & impacting risk. Review trend of amount of on-line maintenance. DCCP Assessment of Maintenance Risk and On-Line Maintenance Risk Procedures have been substantially upgraded with the addition of an Integrated Risk Review Team [Reviewed on-line maintenance risk 4/16FF and 4/18FF – satisfactory.]	See list at end of OIL	Regularly
CM-13	M	Review Maintenance Department performance measures, staffing, etc. approximately annually.	11/18FF 1/20FF	1Q21FF
EN		Engineering Programs (EN)		
EN-16	F	DCCP Systems – review a system (or structure or component), system health, long-term plan, Maintenance Rule performance & walkdown with System Engineer at FFs. [Note: Systems reviewed are listed with dates at the end of this Open Items List.]	See list at end of OIL	Regularly
EN-19	F	Review every 12-18 months major Engineering Programs, including Configuration Management, Management, System Engineering (system health & long-term plans), Valve Testing, Margin Management, Staffing, etc. [Note: Programs reviewed are listed with dates at the end of this Open Items List.]	See list at end of OIL	Regularly
EN-20	F	Each Member should review or observe Plant Health Committee meetings. [Note: next action changed to "Regularly" and noted in table at the end of the OIL.] Ferman or Rick will check to see what other meetings would be of interest to the DCSIC. {Are there other regular meetings the DCISC should attend?}	See list at end of OIL	Regularly
EN-31	F	The fact-finding team received an overview of the [Engineering Excellence] plan and should follow up in the future with a more detailed review of selected elements of the plan.	12/18FF 11/19FF	1/20FF 4Q20FF
HP		Human Performance: Human Errors and Improving Safety & Efficiency of Plant Performance		
HP-1	M	Review human performance & human behavior items (including error reduction programs, HP PIs, aberrant behavior statistics, FFD, stress reduction programs, Personnel Accountability Policy, Human Performance Steering Committee & Subcomm, Centers of Excellence, Org. Development). [Review biennially operator aging, physical fitness, "no solo" issues, attention enhancement, stress management, & incentives for operator focus. Reviewed Ops Human Performance at 8/16FF – satisfactory.] [Reviewed human performance 9/18FF – excellent.]	8/16FF 9/18FF 10/19PM	3/20FF
HP-25	M	Further observations and improvements in the Management Observation Program should be reviewed by DCISC. [Reviewed 4/19FF – satisfactory.]	7/17FF 4/19FF	1 or 2Q21FF
HS		Health, Nuclear Safety and Safety Conscious Work Environment		
HS-6	F	Follow DCCP progress in establishing/improving its safety culture (and its subset Safety Conscious Work Environment, including Safety Culture Monitoring Panel, and including Employee Concerns & Differing Professional Opinion Programs). [Reviewed ECP 10/17FF – sat.]	10/18PM 8/19FF	3Q20FF
PI		Performance Improvement Programs		

PI-1	DCPP Performance Improvement Programs: Corrective Action, Self-Assessment, Operating Experience [and line use of OE], Benchmarking, etc. Programs reviewed are listed with dates at the end of the Open Items List.] [Observed CARB Mtg. 5/18FF – satisfactory.]	See list at end of OIL	At least once per year
EP	Emergency Preparedness (EP)		
EP-2	M Attend and observe DCCP emergency drills and exercises annually [including Hostile Action Based Exercises], paying special attention to JIC communications to the media and public, including radiation release communications to the public, use of social media, coordination of information release with SLO County, and extension of drills to better exercise FMTs & JMC.	2/17PM 8/18FF 11/18FF	Next evaluated exercise (FFPM)
EP-3	M Emergency preparedness during decommissioning. [Met with SLO OES 9/18FF – satisfactory <i>there was concern by SLO County that their monies from PG&E would be reduced after operation ceases. [Met with new Director SLO Emergency Services 8/19FF. Director to address DCISC February 2020 PM.]</i>	10/18PM 8/19FF	2/20PM
RA	Risk Assessment and Management (RA)		
RA-5	M Review overall [non-seismic] PRA program annually. Include Fire PRA Upgrade & Shutdown Analysis in next review. Much work underway (including plant specific shutdown risk analysis). Review PRA Group resources/capabilities. Turbine Bldg. (CCW & Condenser) internal flooding. Include external flooding and tsunami risk (see SC-6). [2/18PM: Review DCCP study of loss of ASW on core damage frequency.	8/16FF 9/17FF 9/18FF 9/19FF	4Q20FF RJB
RA-6	F Monitor Seismic Fragility Analysis progress. [Reviewed at 9/17 FF – satisfactory.] [Review after next submittal to NRC.] Review Seismic PRA annually. [Reviewed Seismic PRA 8/16FF – satisfactory.] [Review DCCP seismic PRA April 2018 submittal.]	8/16FF 9/17FF	2Q20FF RJB
NS	Nuclear Safety Oversight and Review (NS)		
NS-5	M Monitor NSOC meetings periodically to observe their processes and their review of nuclear safety issues. [Reviewed at 11/17FF – satisfactory.] [2/19 NSOC conflicted with PM.]	11/15FF 3/17FF	Next meeting
NS-9	M Monitor DCCP's program to track INPO Areas for Improvement. Review with DCCP Coordinator. [Reviewed results of Aug/Sep INPO evaluation – satisfactory.]	8/19FF 11/19FF	3Q20FF
RP	Radiation Protection (RP)		
RP-3	M Regularly review outage RP performance. [Reviewed 1R21 and 2R21 outage performance – satisfactory.]	3/19FF 12/19FF	Each RFO 12/20FF
RP-12	M Review annual DCCP radioactivity release report each year. Review at Summer or Fall FFs. [Reviewed radiation release reports 7/18FF – satisfactory.]	7/18FF 7/19FF	3Q20FF
QP	Quality Programs (QP)		
QP-3	M Review the activities, organization and results of QV audits as well as PG&E's outside biennial audits, including timeliness of corrective actions. Review annually – include 4 th quarter QPAR with yearly results.	8/19FF 11/19FF	1Q20FF
QP-9	F Software QA Program - [Reviewed at March 2018 FF – satisfactory.]	See list at end of OIL	Regularly
NF	Nuclear Fuel Performance (NF)		

NF-9	M	Nuclear Fuel Performance & Issues (review after RFOs). [Reviewed at 11/16FF – satisfactory.] [2/17PM. [Reviewed 2R20 results at 4/18FF – no fuel problems noted.] [Reviewed nuclear procurement process 7/18FF – satisfactory.]	7/18FF <i>12/19FF</i>	Each RFO <i>12/20FF</i>
ER		Equipment Reliability and Life Cycle Management (ER)		
ER-5	M	Monitor the Equipment Reliability Process approximately annually. The indicators for Deficient Critical Components Backlog and Operational Work-arounds rated as needing improvement and the DCISC should continue its review of this item in the future.	See list at end of OIL	Annually
OE		Organizational Effectiveness & Development (OE)		
OE-1	F	Review DCCP Operating Plan each January after development. [Reviewed at 1/16FF & on agenda for 2/16PM.] [Reviewed at 3/18FF – satisfactory.]	2/17PM 3/18FF	2/20PM
SE		System and Equipment Performance/Problems (SE)		
SE-26	M	Review reactor pressure vessel compliance status after next set of surveillance samples is analyzed and effective vessel lifetime projections are updated. [Reviewed 3/17FF – satisfactory.]	3/16FF 3/17FF 4/19FF	1R22 2R22
SE-39	F	Review and tour the inspections and repairs of concrete Intake Structures following selected refueling outages. [Reviewed at 7/09 FF, 6/13 FF, 11/14FF, and 9/17FF – satisfactory.]	<i>12/19FF</i>	2R22 <i>3Q21FF</i>
SE-40	F	Monitor the status of transformers & leakage, failures, corrective actions. Follow status of transformer protection barrier. [Barrier project placed on hold.]	See list at end of OIL	Regularly
SE-42	F	Safety System Functional Failures – review annually. [Reviewed at 9/15FF – much improvement – continue to monitor.] [Reviewed 3/22/17FF and 6/17FF – much improvement.]	6/17PM 8/19FF	4Q20FF
SE-49	F	Emergency Diesel Generators (EDGs) – [Reviewed at 1/19FF: U1 Green, U2 White.] [Review EDG Reliability Program at next EDG FF].	See list at end of OIL	Regularly
SE-52	F	Mr. Wardell reported the fuel handling equipment is being brought to a healthy status but the DCISC should continue to monitor these efforts with reference to any issues of obsolescence or problems obtaining replacement equipment [4/18FF: Fuel Handling Equipment worked well in 2R20.] [Reviewed improvements to SFP bridge crane – satisfactory. Close if 1R21 & 2R21 performance good, <i>which it was. Close.</i>]	6/17PM 4/18FF 12/18FF <i>12/19FF</i>	<i>Close</i>
SE-53	F	Monitor salt deposition on external equipment, systems, EDG, ventilation systems, transformers, etc. [Check with DCCP on data availability beforehand.] [Determine rate of salt deposition.] [Reviewed at 5/18FF, no flashover issues since 2013.]	7/16FF 5/18 FF 12/19FF	<i>Close</i>
SG		Steam Generator Performance (SG)		
SG-1	M	Results of inspections and tests occurring in outages 1R21 and 2R21.	10/18PM <i>1Q20FF</i>	Post-RFO with <i>SG</i> <i>inspection</i>
OM		Outage Management (OM)		

OM-3	M	During outages, monitor Outage Coordination Center, Control Room, and containment walkdown/inspection (end of outage). Review outage turbine work. Review Steam Generator performance metrics and inspection results. [Reviewed 1R21 3/19FF – satisfactory.]	3/18FF 3/19FF 11/19FF	Each RFO 11/20FF
OM-4	M	Review Outage Safety Plan, safety margin trends, outage results, including clearances, following each outage at FFs and PMs. [Reviewed at 1/19FF & 9/19FF – satisfactory.]	9/19FF 12/19FF	Each RFO 8/20FF
OM-5	F	DCPP has determined that it needs to do a better job of foreign material exclusion (FME) and this resolution appeared satisfactory to the DCISC team. [Note: FME Program review dates at the end of the Open Items List.] [Reviewed 9/17FF – satisfactory. [Reviewed 4/19FF – need to follow up on supplemental outage worked training]	See list at end of OIL	Each RFO 12/20FF
SEC		Security (SEC)		
SEC-3	M	Monitor interaction of Security and Operations, Engineering, Maintenance, and Emergency Preparedness for effects on nuclear safety. Plant security per se not reviewed but reviewed only in the context of impact on plant operation.	5/18FF 7/19FF 12/19FF	4Q20FF
SEC-4	M	Review DCPP progress in implementing their cyber security program in compliance with NRC schedule. Implementation complete. [5/18FF: The DCISC should continue to review the Cybersecurity Program every two to three years.] [Reviewed digital control cyber security 3/19FF – satisfactory.]	6/18PM 2/19PM 3/19FF	1Q21FF
SF		Independent Spent Fuel Storage Installation – ISFSI (SF)		
SF-1		Monitor ISFSI operations, including cask transfer. Review following next campaign. [Reviewed ISFSI 7/18FF – satisfactory.] Reviewed future movement of spent fuel 4/19FF – satisfactory.]	4/19FF 8/19FF	4Q20FF
SF-2	M	Follow technical advances of relative risks of cask and pool storage. NRC Staff study and Commissioners' vote. Monitor needs for opening casks to inspect fuel. Monitor SONGS & Humboldt Bay spent fuel transfer plans. Include corrosion of metals [Reviewed at 12/16FF – satisfactory.] [Reviewed inspections 12/17FF – satisfactory.]	4/19FF 12/19FF	3/20FF
SF-3	M	Review the seismic adequacy of ISFSI in its license extension. Use latest seismic analysis.	6/18PM 10/19PM	2Q22FF RJB
SC		Seismic, Tsunami and Other External Events		
SC-3	M	Long-Term Seismic Program: review periodically. Review significant seismic events as they occur. Reviewed at 6/09 PM. [Reviewed 3/10 FF – progress satisfactory. Continue to monitor.] DCCP Seismic study reviewed 3/15 FF & to be presented by DCCP at 6/15PM. Shoreline Fault – follow activities and events with the Shoreline Fault. LTSP reviewed at 3/19FF – satisfactory.	6/15PM 11/15FF 8/16FF 3/19FF	1Q21FF RJB
SC-12	F	Workplace seismic safety – review annually. [Reviewed at 5/18FF – some problems – follow up on resolution and Control Room procedures “crash cart” stability. [Discrepancies in workplace seismic standards (e.g., unbraced furniture) were caused by inadequate knowledge transfer during Building Services personnel turnovers, although the plant had a written standard. [Reviewed 5/19FF – overall satisfactory – but two examples of unsecured tall cabinets. Notifications written.]	5/19FF 12/19FF	12/20FF PFP
FP		Fire Protection (FP)		

FP-5	M	Review NFPA-805-based Fire Protection Program and Systems every two-three years, including QV audits and NRC triennial inspections. Review the health and correction of degraded systems every six months. Monitor fire doors (Plant Door Life Cycle Management Plan) for correction of impairments [Fire doors Reviewed 11/17FF & 3/19FF - satisfactory.] [Reviewed NRC Triennial FP Inspection 1/19FF - satisfactory.]	7/17FF 11/17FF 1/19FF 3/19FF	1Q20FF
LD		Learning & Development Programs (LD)		
LD-3	M	Review non-license technical, operations & accredited training programs at least annually. [Reviewed Training for Temporary Outage Workers 12/14FF - satisfactory.]	12/14FF 7/19FF	2Q20FF
LD-6	F	Observe operator license, re-qualification, classes periodically in FF meetings. Include Enhanced Simulator Training. [Observed Ops TCOA training & Eng. DC Power System] [Reviewed FLEX training 11/17FF - sat.] [Reviewed licensed operator training plans 1/19FF - satisfactory.]	8/18 FF 1/19FF 1/20FF	3or4Q20 FF
NR		Nuclear Regulatory Commission Items (NR)		
NR-3	M	Monitor the Non-Cited Violation Tracking & Trending Program annually at the Jan/Feb Public Meetings.	3/year	Each PM
NR-4	F	Meet with NRC Resident Inspectors regularly.	Most FFs	Regularly
BDB		Beyond Design Basis Events (e.g, Fukushima Event)		
DEC		Decommissioning		
DEC-1	F	Review DCCP decommissioning plans periodically as a result of the Joint Proposal forced plant shutdown in 2025. Review the timing of spent fuel transfer from wet to dry storage and when the spent fuel pools are decommissioned the plant will lose the capability to open multipurpose canisters for inspection. DCISC should actively review the decommissioning plans for DCCP because of the potential impact on staffing and future options with respect to managing spent fuel. Dr. Peterson observed there have been multiple approaches taken to decommissioning in terms of rate and timing and the DCISC will need to review and discuss with its appointing entities whether and to what extent it will engage in a review of PG&E's decommissioning plans for DCCP. [Reviewed at 11/18FF - satisfactory. Continue to monitor.] He [Mr. Jones] reported part of the preplanning efforts to meet the charge from the CPUC is the completion of a fuel study that is now in its second draft for review to determine how DCCP can move past the ten-year window to achieve a seven-year window. Dr. Budnitz reported the DCISC will wait and watch the report which comes out of that evaluation.	1/17FF 10/17PM 3/18FF 10/18PM 11/18FF 2/19PM 10/19PM	10/20PM
DEC-3	F	DCISC is at this time principally interested in decommissioning due to the potential impacts during the period of plant operation and will seek clarification about whether the DCISC should play a role post-shutdown.	10/18PM 6/19PM 10/19PM	2/20PM
O		Other Items (O)		
O-1	F	Perform observations of evolutions (work processes) within the plant periodically. Continue with these about annually. [Observed Operations shift turnover brief 12/19FF - satisfactory.]	12/19FF 1/20FF	2Q20FF
2/16 PM 10		Public Meeting Items (PM) (Reference: Public Meeting Minutes Pages)		
	F	Permanent corrective action installing [4kV] solid-state relays will be completed during refueling outages 1R21 2R21. The fact-finding team concluded reasonable progress has been made but the DCISC should continue to monitor station progress with regard to the potential open phase conditions, which could affect plant safety systems. [Reviewed at 5/16FF - satisfactory. Continue to monitor.]	2/16PM 5/16FF	1/20FF then Close

Oct 2018 16	F	Dr. Budnitz commented that such a letter might include separate attachments setting forth the individual Member's views. Dr. Peterson stated this discussion highlighted a number of actions the DCISC should now take and document in its Open Items List to develop a strong foundation for making a credible recommendation to the CPUC including looking at an alternative budget and structure for its fact-findings and public meetings and he commented a recommendation may not be necessary in context of a report seeking a decision that emerges out of condensing the discussion about a post-shutdown role for the DCISC. Dr. Budnitz reiterated his belief that the Committee should make a recommendation that it should continue in existence after the plant is shut down until the final transfer of fuel from the spent fuel pools to the ISFSI has taken place.		2/20PM
Feb 2019 3	F	At that time [2013-2014] the Committee was told by PG&E that NRC regulation B.5.b requires four times the number of assemblies as the number of assemblies in final core offload to be within the spent fuel pool inventories, which number has changed for reasons Mr. Geesman stated he did not understand from 605 assemblies to 730 assemblies, but now appears to have stabilized at 760 assemblies. PG&E at that time was planning on a regular transfer campaign schedule that would maintain the 760 assemblies in each of the two spent fuel pools. Mr. Geesman stated the current PG&E plan would now allow 760 assemblies to become 1,300 assemblies. Dr. Lam replied that Mr. Geesman's remarks were very well received by the Committee and worthy of further inquiry.	2/19PM 12/19FF	3/20FF
9	F	Dr. Peterson remarked that at the appropriate time, the DCISC will schedule a meeting with Mr. Guzzardi [SLO County Emergency Services Manager] and request him to make a presentation to the Committee, possibly at the DCISC's June 4-5, 2019 public meeting.	2/19PM	2/20PM then Close
June 2019 PM 2	F	In response to Consultant McWhorter's inquiry concerning when a foreign material exclusion (FME) issue becomes a human performance issue Mr. Petersen reported that not all FME events are human performance-related but he remarked he would have to review plant procedures to provide a response to Mr. McWhorter's query, however, he remarked that human-related FME events are very rare and the Station-level threshold for same is quite high and generally involves significant damage.	6/19PM	2/20PM then Close
3	F	Dr. Peterson observed the variable frequency drive motor is within the design basis for the crane and was most likely a modification made at some point and this would be a potential topic for DCISC review during fact-finding.	6/19PM	5/20FF PFP
4	F	Mr. Peck stated DCPD does not 'own' the special expertise required to redesign the SPS logic and he offered to review with the DCISC during a future fact-finding the method of how the SPS logic functions to select the unit it will trip.	6/19PM	3/20FF

Oct 2019 PM 1	F	Mr. McWhorter reported a Recommendation was made in the Fact Finding Report that the Committee follow-up on the adequacy of root cause evaluations and the corrective actions taken for root causes identified. Dr. Peterson confirmed, in response to a comment by Dr. Budnitz, that the NRC resident inspectors also reviewed the issue of the suspension of the reactor head and found the event's safety significance to be low. Consultant Wardell commented the DCISC fact-finding visit scheduled in November 2019 will include following up on the Recommendation concerning root cause evaluations at DCP. [Actions completed: recommendation to be removed at February 2020 PM.] Close.	10/19PM	2/20PM then Close
2	F	The DCISC team concluded the Buried Tanks and Piping Program appears to be effectively implemented but the Committee should review the new program sometime in the first half of 2020 to assess the results of the new Asset Management Plan.	10/19PM	2Q20FF
3	F	The DCISC team found the System Engineering Department to be effective in managing the health of plant systems but the Department is undergoing significant organizational changes and Mr. McWhorter recommended the DCISC review the System Engineering Department again in late 2020.	10/19PM	3Q20FF
4	F	Mr. Wardell reported the fact-finding team met with NRC Senior Resident Inspector Mr. Chris Newport. Topics discussed with Mr. Newport included . . . the possible decline occurring in human performance at DCP due to a number of low level events taking place concerning which Mr. Wardell suggested the DCISC continue to monitor and periodically review with the NRC resident inspectors.	10/19PM	2Q20FF
5	F	[T]he DCISC fact-finding team discussed the assessment of 91 fire protection procedures for off-normal situations. Mr. Wardell reported the Quality Assurance organization discovered some technical errors in these procedures which were written by a contractor and Quality Assurance's findings were reviewed by Operations. Approximately 75 of the 91 procedures had been reviewed at the time of the DCISC's fact-finding visit and the full review is expected to be concluded by mid-October 2019 and Mr. Wardell recommended the DCISC review the conclusion of that review. [Review completed at November 2019 FF. Satisfactory. Close.]	10/19PM	Close
6	F	Mr. Wardell remarked he believes the UCLA study is looking at other possible cask designs apart from those now used at DCP. The DCISC will review the UCLA study in a fact-finding when the study is completed. [Reviewed at 12/19FF: final study expected early February 2020.]	10/19PM	3/20FF
7	F	Dr. Budnitz observed that it is the County's responsibility, acting through its Director of OES, to act on any protective action recommendation that might be made by PG&E/DCPP in the course of an emergency event. Dr. Budnitz remarked the DCISC's February 2020 public meeting may provide an opportunity to address this issue with Mr. Guzzardi.	10/19PM	2/20PM then Close
8	F	Mr. McWhorter suggested and Mr. Hamzehee agreed that for future presentations to the DCISC it would be helpful for DCP to share with the DCISC the current status of how many entries are then currently within each of the various cross-cutting aspect categories of plant performance.	10/19PM	2/20PM then Close
9	F	Mr. McWhorter commented that the DCISC expects to have the opportunity to review the UCLA study during its upcoming December 2019 fact-finding visit. [Completed. See Item 6 above. Close.]	10/19PM	Close

Diablo Canyon Independent Safety Committee Open Items List – 2019-2020

DCPP Systems/Components Reviewed Periodically

4 kV – Jan 2020
 230 kV & 500 kV – Dec 2019
 Aux Feedwater – Nov 2017
 Aux Saltwater – Sep 2017
 Aux Bldg Ventilation – Mar 2017
 Centrifugal Charging Pumps – Mar 2017
 Component Cooling Water – May 2017
 Compressed Air – Mar 2017FF
 Condensate – Sep 2019
 Containment Structure – Nov 2019
 Containment Spray – Aug 2019
 Control Room Simulator – Sep 2018
 Control Room Ventilation – April 2018
 Digital Systems – Sep 2018
 DC Power – Apr 2019
 EDG – Jan 2019
 High Pressure Injection (Safety Injection) – May 2019
 Plant Protection System – Nov 2017
 Radiation Monitoring – Jan 2018
 Radwaste Processing – Aug 2017
 Reactor Coolant – Aug 2018 [Review 4Q19]
 RCS Process Control System – Nov 2016
 Reactor Coolant Pumps – Nov 2018
 Refueling Equipment – Dec 2018
 RHR – Dec 2019
 Safety Injection Pumps Nov 2018
 Spent Fuel Pool – May 2018
 Steam Generators – Jan 2020

DCPP Programs Reviewed Periodically

ALARA – Sep 2019
 AOV – May 2018
 Benchmarking – Nov 2018
 Boric Acid Corrosion Control – Apr 2018 (review biennially)
 Buried Piping & Tanks – Jul 2019
 Chemistry – Aug 2018

Cranes – Sep 2019
 Configuration Management – May 2019
 Corrective Action – CARB Nov 2019
 Emergency Preparedness Exercises – Nov 2018
 Employee Concerns Program – Oct 2017
 Equipment Environmental Qualification – Aug 2017
 Equipment Reliability – Mar 2019
 Excellence Plan – March 2018
 Fire Doors & Door Life Cycle Mgm't. Plan – Mar 2019
 Fire Protection (Non-NFPA-805) – Mar 2017
 Fire Protection (NFPA-805) – Aug 2018
 FLEX Program – Apr 2019
 Flow Accelerated Corrosion – Apr 2019
 FME – Dec 2019
 In-service Inspection Program – Apr 2019
 Integrated Risk Assessment Program – Jun 2015
 Large Motors – Jan 2019
 Long-Term Capital Planning Process – Dec 2016
 Margin Management – Jan 2017
 MIDAS – Aug 2018
 Nuclear Fuel Program – Aug 2017
 On-Line Maintenance – Apr 2018
 Operating Experience – Aug 2018 (review biennially)
 Operability Assessment Program – Mar 2017
 Operational Decision Making – Apr 2015
 PRA Programs (non-seismic) – Sep 2017
 Performance Improvement – Apr 2019
 Performance Review Quarterly Meeting – May 2015
 Plant Health Committee – Jan 2020
 Reactivity Management – Nov 2019
 Safety-Security Interface – Jul 2019
 Self-Assessment – Sep 2016
 Single Point Vulnerabilities – Sep 2019
 Seismic PRA – Sep 2017
 Seismically Induced System Interactions – 5/17FF (review biennially)
 Software QA – March 2018
 System Engineering – Jul 2019

February 12-13, 2020 Public Meeting
 2/3/20

FF = Fact-finding Meeting PM = Public Meeting Q=Quarter

Transformers, Large – May 2018
Trending Analysis – Jan 2014
Troubleshooting – Jan 2020
Tsunami Hazard Analysis – Sep 2017
Vibration Monitoring – Jul 2019

February 12-13, 2020 Public Meeting
2/3/20

FF = Fact-finding Meeting

PM = Public Meeting

Q = Quarter

DIABLO CANYON INDEPENDENT SAFETY COMMITTEE

AGENDA TRANSMITTAL FORM

MEETING DATE:	February 12, 2020
AGENDA ITEM:	VI-B
AGENDA TITLE:	Documents Provided to the Committee

CONSENT ☐ ACTION ☐ INFORMATION ☒

Staff Summary: Attached for your information are copies of the transmittal memoranda which list the various documents provided to the Committee by PG&E since your last public meeting in October 2019.

RECOMMENDED COMMITTEE ACTION: None, information item only.

October
List of Documents Transmitted Electronically

A. Licensing Basis Impact Evaluations

Date	LBIE No.	Title
		There are no LBIEs for this month.

B. NRC Outgoing Correspondence (incl. LERs, LARs, etc.)

Date	Letter No.	Title
10/3/19	DCL-19-078	10 CFR 50.46 Annual Report for Emergency Core Cooling System Evaluation Model Changes for Peak Cladding Temperature for 2018
10/17/19	DCL-19-085	Material Status Report for the Period Ending August 31, 2019
10/24/19	DCL-19-086	Supplement to "License Amendment Request 18-02, License Amendment Request to Revise Technical Specification 5.6.5b, 'Core Operating Limits Report (COLR)' for Full Spectrum Loss-of-Coolant Accident Methodology"
10/24/19	DCL-19-088	Supplemental Information Response to NRC Request for Additional Information Regarding 'License Amendment Request 19-01, Proposed Changes to the Intake Structure Physical Security Classification'
10/31/19	DCL-19-084	ASME Section XI Inservice Inspection Program Request for Alternative NDE-RCS-SE-2R22 Use of Alternate Sizing Qualification Criteria Through a Protective Clad Layer
10/31/19	DCL-19-091	Letter to Inform the NRC of the Submittal Date for the Post-Shutdown Decommissioning Activities Report, Site-Specific Decommissioning Cost Estimate, and Irradiated Fuel Management Plan

C. NRC Incoming Correspondence (including Inspection Reports)

Date	Title
10/7/19	Diablo Canyon Nuclear Power Plant, Units 1 and 2 – Request for Withholding Information from Public Disclosure (EPID L-2018-LLA-0730)
10/7/19	Diablo Canyon Nuclear Power Plant, Units 1 and 2 – Correction to Issuance of Amendment Nos. 233 and 235 to Revise the Emergency Plan to Change Staffing and Extend Staff Augmentation Times for Emergency Response Organization Positions (EPID L-2018-LLA-0248)
10/11/19	Diablo Canyon Nuclear Power Plant, Units 1 and 2 – Regulatory Audit Summary Regarding License Amendment Request to Revise Technical Specification for Use of Full Spectrum Loss-Of-Coolant Accident Methodology (EPID L-2018-LLA-0730)
10/30/19	Diablo Canyon Power Plant, Units 1 and 2 – Integrated Inspection Report 05000275/2019003 and 05000323//2019003

D. NSOC/PSRC Documents (NSOC Minutes, NSOC Responses, PSRC Minutes)

Date	Doc. No.	Title
PSRC Minutes	2019-013	NOED, "Unit 2 Auxiliary Building Ventilation System Charcoal Filter Replacement"

October
List of Documents Transmitted Electronically

E. CAP Documents (RCAs, ACEs, CAP Effectiveness Evaluations)

Type	Doc. No.	Title
RCAs		There are no RCAs for this month.
ACE	SAPN 51040114	DA-SGI Container Improperly secured
Eff. Eval		There are no Effectiveness Evals for this month.
2 WGE	SAPN 50968663	LTCA-DA-PCV-455A volume booster not
2 WGE	SAPN 50985639	DA-2018 DBA EQ: IH-06 Conduit Configurat
2 WGE	SAPN 50992884	DA-AFHBVS POV Trouble Adverse Trend
2 WGE	SAPN 51011724	Eval Accountability for Visitors
2 WGE	SAPN 51033876	DA-Trend:NRT Re-Review Process Not Adeq
2 WGE	SAPN 51036615	DA-QAAF Critical Digital Asset Key Contr
2 WGE	SAPN 51037612	DA-Maintenance Services Performance Tren
2 WGE	SAPN 51046215	DA-Missed Fire Watch Rove
2 WGE	SAPN 51047760	DA-CRVS Compressor Trend
2 WGE	SAPN 51044449	DA-RHR Pump 2-1 Recirc Valve 641A Cyclin
2 WGE	SAPN 51048471	PPS channel set II Rack 8 failure Alarm
2 WGE	SAPN 51048844	DA-Individual allowed BOP sup qual to ex
2 WGE	SAPN 51048883	Adverse Trend Paint on Fire Sprinklers
2 WGE	SAPN 51049091	DA-PA Training allowed to expire
2 WGE	SAPN 51050523	Prohibited item (alcohol) inside the main PA
2 WGE	SAPN 51050548	FME Material not accounted for on Log
2 WGE	SAPN 51050869	DA-Prohibited item (alcohol) inside main
2 WGE	SAPN 51050890	RTL minimum staffing/ASO breaks
2 WGE	SAPN 51051105	DA-FME Material not accounted for on Log

October
List of Documents Transmitted Electronically

2 WGE	SAPN 51051242	Untimely Logging of Security Event
2 WGE	SAPN 51051642	Continuous Rove Fire Watch Gaps
2 WGE	SAPN 51052198	Sec – Expired FOF Drill Controller Qual

F. QV Documents (QPAR, Audit Reports, Audit Schedule, Assessments)

Date	Doc. No.	Title
		There is no QPAR for this month.
		There are no Audit Reports for this month.
11/1/19		Quality Digest; Information You Can Use; November Edition 2019

G. Nuclear Safety Culture Monitoring Panel Reports

Date	Doc. No.	Title
		There is no Nuclear Safety Culture Monitoring Panel report for this month.

H. Self Assessment/Benchmarking (SA/BM Reports/Schedules)

Date	Doc. No.	Title
10/15/19	SAPN 51010785	Informal Benchmk – ANO Eval
10/15/19	SAPN 51047138	Self-Assessment Benchmark Range Safety
10/16/19	SAPN 51049801	Informal Benchmark FOCUS Vision Meeting
10/29/19	SAPN 51052197	Bench Mark IDS Testing Palo Verde
10/29/19	SAPN 51052349	SEC Informal Peer Assessment at PVNGS
10/14/19	SAPN 51042654	Perform 2019 Part 37 Assessment
10/24/19	SAPN 51052167	NRT Quick Hit Self-Assessment
11/12/19	SAPN 50874890	2016 Maintenance Rule (a)(3) Assessment
11/12/19	SAPN 51000617	2018 MR (a)(3) Assessment
11/13/19	SAPN 51016310	Perform 1R21 QHSA

October
List of Documents Transmitted Electronically

I. Performance Information (PPIR, Operating Plan, Station Initiatives, IPMs)

Date	Doc. No.	Title
3/25/19		Nuclear Generation Operating Plan 2019 – 2023, No new updates this month.
PPIR		There is no PPIR this month.
Station Initiative		There are no new Station Initiatives this month.
10/2/19		October 2019 Engineering Performance Improvement Dashboard
10/2/19		October 2019 Security & Emergency Services Performance Improvement Dashboard
10/4/19		October 2019 Operations Services Performance Improvement Dashboard
10/8/19		October 2019 Maintenance Performance Improvement Dashboard
11/5/19		November 2019 Engineering Performance Improvement Dashboard
11/6/19		November 2019 Security & Emergency Services Performance Improvement Dashboard
11/7/19		November 2019 Operations Services Performance Improvement Dashboard
11/12/19		November 2019 Maintenance PI Dashboard

J. INPO

Date	Doc. No.	Title
		There are no INPO documents for this month.

K. Operational Documents (ODM Minutes, POAs)

Date	Doc. No.	Title
ODMs		There are no ODMs for this month.
POA		There are no new POAs for this month.

L. Safety Limit Violation Report

Date	Doc. No.	Title
		There are no Safety Limit Violation Reports for this month.

M. Significance Determination Process Calculations

Date	Doc. No.	Title
		There are no Significance Determination Process Calculations for this month.

October
List of Documents Transmitted Electronically

N. Miscellaneous

Date	Title
	Jim Welsch's Weekly Alignment Update

O. Functional Area Documents

Subcommittee	Date/Doc	Title
Maintenance	Week 201940	T+1 Performance Critique
	Week 201941	T+1 Performance Critique
	Week 201942	T+1 Performance Critique
	Week 201943	T+1 Performance Critique

November
List of Documents Transmitted Electronically

A. Licensing Basis Impact Evaluations

Date	LBIE No.	Title
		There are no LBIEs this month.

B. NRC Outgoing Correspondence (incl. LERs, LARs, etc.)

Date	Letter No.	Title
11/18/19	DCL-19-093, DIL-19-013	Emergency Plan Update

C. NRC Incoming Correspondence (including Inspection Reports)

Date	Title
11/15/19	Acceptance Review – Diablo Canyon Nuclear Power Plant Unit 2, Relief Request NDE-RCS-SE-2R22 for Use of Alternate Sizing Qualification Criteria (EPID L-2019-LLR-0101)

D. PSRC Documents (PSRC Minutes)

Date	Doc. No.	Title
PSRC Minutes		
3/13/19	2019-006	OP L-0, Attachment 5 – Mode 5 to 4 transition
7/30/19	2019-011	AD2.ID1, Rev 28 – Procedure and Work Plan Use and Adherence
10/8/19	2019-014	E-Plan, Section 7 – Emergency Facilities and Equipment
8/27/19	2019-012	2R21 Outage Safety Plan
11/14/19	20109-015	Readiness for Restart Mode Change 5 to 4

E. CAP Documents (RCAs, ACEs, CAP Effectiveness Evaluations)

Type	Doc. No.	Title
RCAs		There are no RCAs for this month.
ACE	SAPN 51045966	DA-U2 ABVS EFC-1 Failed Charcoal Lab Tes
	SAPN 51046217	DA-ASWP 2-1 stopped immediately after st
Eff. Eval	SAPN 50946185	RCE Response to Nitrogen Leak
1 WGE		There were no 1WGEs closed in November.
2 WGE	SAPN 50929166	DA-HTR 2 DRN PP recirc lineup not as exp
	SAPN 50932649	DA-Security Officer Inattentive to Dutie

November
List of Documents Transmitted Electronically

	SAPN 50941684	DA-GSC-1-425 Found Throttled
	SAPN 50977242	DA-Man-lift contacted and damaged guardr
	SAPN 50979160	DA-2018 PIR Green NCV
	SAPN 50991907	DA-Scaffold >90 days w/o LBIE
	SAPN 51002942	DA-Employee Injury – Left Shoulder
	SAPN 51002943	DA-Employee Injury – Strained Bicep
	SAPN 51002944	DA-Officer Injury – Right Knee
	SAPN 51003094	DA-Haz Waste not Processed IAW ENV.HW2
	SAPN 51007664	DA-Security loss of power
	SAPN 51036021	DA-Repair&Return Mat'l outside Process
	SAPN 51038095	DA-QAAF-UFSAR Org Chng Prosses Not Follo
	SAPN 51048612	DA-PPS channel set II Rack 8 failure Ala
	SAPN 51051265	DA-RTL minimum staffing/ASO breaks
	SAPN 51051374	DA-Untimely Logging of Security Event
	SAPN 51052465	DA-Sec – Exp. FOF Drill Cntrlr (Cat.2)
	SAPN 51036847	DA-NRC H.12 Complacency x-cutting trend
	SAPN 51045099	DA-Adverse Equipment trend
	SAPN 51052101	DA-ASW2-2 Exh Fan 102 Bkr TOL
	SAPN 51024933	DA-Potential Adverse Vendor Equip Trend
	SAPN 51031772	DA-QAAF: Errors in OP AP-34/OP AP-8C
	SAPN 51042617	DA-U2 SFP crane contact w/ swing gate
	SAPN 51035839	DA-QDEF Control & Storage of QA records
	SAPN 51041217	DA-Trend – Timeliness of MR PC1 Evaluati

November
List of Documents Transmitted Electronically

	SAPN 51052100	DA-Continuous Rove Fire Watch Gaps
	SAPN 51024613	DA-Adverse Trend in Fire Damper matrl co
	SAPN 50987788	LTCA DA- 2R21 REPLACE 2-M-20 DAMPER
	SAPN 51018536	DA-QDEF: Vendor Perf Gaps NOT documented
	SAPN 51048426	DA-phone fell into Reactor Cavit

F. QV Documents (QPAR, Audit Reports, Audit Schedule, Assessments)

Date	Doc. No.	Title
		No QPAR for this month.
11/18/19	QVA # 193020004	Stator Core Cooling Water Event Classification
12/3/19		Quality Digest; Information You Can Use; December Edition
11/12/19	File # 192970020	Untimely Resolution of Security Intrusion Detection Equipment Issues

G. Nuclear Safety Culture Monitoring Panel Reports

Date	Doc. No.	Title
		There is no nuclear Safety Culture Monitoring Panel report for this month.

H. Self Assessment/Benchmarking (SABM Reports/Schedules)

Date	Doc. No.	Title
12/4/19	SAPN 50998430	QHSA-Recur Assessment Reqt in PI Proced
12/4/19	SAPN 51034462	QHSA on IER 17-5 response

I. Performance Information (PPIR, Operating Plan, Station Initiatives, IPMs)

Date	Doc. No.	Title
3/25/19		Nuclear Generation Operating Plan 2019 – 2023, No new updates this month.
PPIR		Diablo Canyon Power Plant; Plant Performance Improvement Report Achieving Results; Data: September 2019; Report Date: October 31, 2019
Station Initiative		There are no new Station Initiatives this month.

November
List of Documents Transmitted Electronically

IPM		There are no IPMs this month.

J. INPO

Date	Doc. No.	Title
		There are no INPO documents for this month.

K. Operational Documents (ODM Minutes, POAs)

Date	Doc. No.	Title
ODMs		There are no ODMs for this month.
POA		There are no new POAs for this month.

L. Safety Limit Violation Report

Date	Doc. No.	Title
		There are no Safety Limit Violation Reports for this month.

M. Significance Determination Process Calculations

Date	Doc. No.	Title
		There are no Significance Determination Process Calculations for this month.

N. Miscellaneous

Date	Title
11/4/19	Jim Welsch's Weekly Alignment Update

O. Functional Area Documents

Subcommittee	Date/Doc	Title
Maintenance	Week 201944	T+1 Performance Critique
	Week 201945	T+1 Performance Critique
	Week 201946	T+1 Performance Critique
	Week 201947	T+1 Performance Critique
	Week 201948	T+1 Performance Critique

P. Documents Previously Transmitted during the Month

Date	Doc. No.	Title
		If none, state none

December
List of Documents Transmitted Electronically

A. Licensing Basis Impact Evaluations

Date	LBIE No.	Title
		There are no LBIEs for this month.

B. NRC Outgoing Correspondence (incl. LERs, LARs, etc.)

Date	Letter No.	Title
12/4/19	DCL-19-077	Diablo Canyon Power Plant, Units 1 and 2 – Post-Shutdown Decommissioning Activities Report
12/4/19	DCL-19-081	Diablo Canyon Power Plant, Units 1 and 2 Irradiated Fuel Management Plan
12/4/19	DCL-19-082	Diablo Canyon Power Plant, Units 1 and 2 – Site Specific Decommissioning Cost Estimate
12/5/19	DCL-19-094	License Amendment Request 19-02; License Amendment Request to Relocate Technical Specification 5.3, "Unit Staff Qualifications," to the Updated Final Safety Analysis Report"
12/5/19	DCL-19-096	License Amendment Request 19-02; License Amendment Request to Relocate Technical Specification
12/9/19	DCL-19-097	Schedule Extension for Full Implementation of Open Phase Detection System

C. NRC Incoming Correspondence (including Inspection Reports)

Date	Title
12/2/19	Acceptance Review – Diablo Canyon Nuclear Power Plant Unit 2, Relief Request NDE-RCS-SE-2R22 for Use of Alternate Sizing Qualification Criteria (EPID L-2019-LLR-0101) (CORRECTED VERSION)
12/17/19	Diablo Canyon Power Plant, Units 1 and 2 – Notification of Evaluations of Changes, Tests, and Experiments Inspection (NRC Inspection Report 05000275/2020001 and 05000323/2020001) and Request for Information
12/31/19	Acceptance Review – License Amendment Request to Revise Technical Specification 5.3, "Unit Staff Qualifications," (EPID L-2019-LLA-0268)

D. NSOC/PSRC Documents (NSOC Minutes, NSOC Responses, PSRC Minutes)

Date	Doc. No.	Title
PSRC Minutes		
12/3/19	2019-017	License Amendment Request 19-02
12/5/19	2019-018	Mode transition with 500 kV Inoperable – LCO 3.0.4.b
12/6/19	2019-019	OP L-0, Unit 2 Mode Change from 5 to 4 (2R21)
12/9/19	2019-020	OP L-0, Unit 2 Mode Change from 3 to 2 (2R21)
2/26/19	2019-004	E-Plan Appendix F, ERO On-Shift Staffing
7/22/19	2019-010	DCL-19-056, "Response to NRC Request for Additional Information (Supplemental) Regarding 'License Amendment Request 18-01, Request to Revise Emergency Plan Response Organization Staffing and Augmentation'"

December
List of Documents Transmitted Electronically

E. CAP Documents (RCAs, WGEs, CAP Effectiveness Evaluations)

Type	Doc. No.	Title
RCAs		If none, then state, "No RCAs for this month"
WGE	SAPN 50707528	LTCA:DA-Condenser SA deficiency
	SAPN 50935776	LTCA Relief Valve O-Ring Classification
	SAPN 50974131	LTCA: U2 Grnds due to fire sprnklr flow
	SAPN 50994629	LTCA:DA-2R21 Damper M-22A
	SAPN 50998154	LTCA Trend- Hazardous Chemical Leaks
	SAPN 51035838	DA-2019 DBAI-Green NCV – Louver Maint
	SAPN 51035841	DA-QARMA-PMCR Expectation Misalignment
	SAPN 51036025	DA-2019 DBAI- MP E-63.6A (2 2R21 NDL 124
	SAPN 51036900	DA-Declining Human Performance Trend
	SAPN 51041066	DA-U2 SYS 63A 4KV Bus F Goal Setting
	SAPN 51048427	DA-Trend – 2R21 Dropped Objects
	SAPN 51049967	DA-OM6.ID1 Officer Injury
	SAPN 51054342	DA-non-compliance with OM11.ID12
	SAPN 51055175	DA-Missed surveillance (SR 3.3.3.1) in 2
	SAPN 51056024	DA-Missed portion of IMP check
	SAPN 51056961	DA-VA door found unsecure (Loggable)
Eff. Eval	SAPN 50994115	Effectiveness Evaluation for DA 50836374

F. QV Documents (QPAR, Audit Reports, Audit Schedule, Assessments)

Date	Doc. No.	Title
		There is no QPAR for this month.

December
List of Documents Transmitted Electronically

1/7/20	FileNet # 192750005	2019 Engineering and Maintenance Rule Programs Audit
1/14/20		Quality Digest; Information You Can Use; January Edition 2020

G. Nuclear Safety Culture Monitoring Panel Reports

Date	Doc. No.	Title
		There are no Nuclear Safety Culture Monitoring Panel Reports this month.

H. Self Assessment/Benchmarking (SA/BM Reports/Schedules)

Date	Doc. No.	Title
	SAPN 50979632	Informal Benchmark – Inv Mgmt Summit
	SAPN 51028612	Trip Report PWROG PSC Mtg, April 2019
	SAPN 51033047	Informal Benchmark/INPO Trip Report
	SAPN 50888982	Diesel Fuel Chem. 2017 Self Assessment
	SAPN 50959021	Formal Self-Assessment SISI Program
	SAPN 51019424	Chemistry Lab QA/QC Self Assessment
	SAPN 51059975	OM15.ID4 Simplification
	SAPN 50977091	QHSA-Sec Equip Pre-Inspection 71130.04

I. Performance Information (PPIR, Operating Plan, Station Initiatives, IPMs)

Date	Doc. No.	Title
1/7/20		Generation Operating Plan 2020 – 2024
PPIR		Diablo Canyon Power Plant; Plant Performance Improvement Report Achieving Results; Data:
Station Initiative		There are no new Station Initiatives this month.
12/10/19		December 2019 Engineering Performance Improvement Dashboard
12/12/19		December 2019 Maintenance PI Dashboard

December
List of Documents Transmitted Electronically

12/12/19		December 2019 Operations Services Performance Improvement Dashboard
12/5/19		December 2019 Security & Emergency Services Performance Improvement Dashboard

J. INPO

Date	Doc. No.	Title
		There are no INPO documents for this month.

K. Operational Documents (ODM Minutes, POAs)

Date	Doc. No.	Title
ODMs		There are no new ODMs for this month.
POA		There are no new POAs for this month.

L. Safety Limit Violation Report

Date	Doc. No.	Title
		There are no Safety Limit Violation Reports for this month.

M. Significance Determination Process Calculations

Date	Doc. No.	Title
		Formal Verbal NOED Request to the NRC – ABVS Charcoal Absorber
12/5/19	Calculation File No. PRA19-09	3.0.4.b Transition from Mode 5 to Mode 4 with Main bank 500kV Unavailable

N. Miscellaneous

Date	Title
12/9/19	2R21 Diablo Daily eConnect - Jim Welsch's Weekly Alignment Update
12/16/19	2R21 Diablo Daily eConnect - Jim Welsch's Weekly Alignment Update

O. Functional Area Documents

Subcommittee	Date/Doc	Title
Maintenance	Week 201949	T+1 Performance Critique
	Week 201950	T+1 Performance Critique
	Week 201951	T+1 Performance Critique
	Week 201952	T+1 Performance Critique

DIABLO CANYON INDEPENDENT SAFETY COMMITTEE**AGENDA TRANSMITTAL FORM**

MEETING DATE:	February 12-13, 2020
AGENDA ITEMS:	VII-A & B and XIII B & C & XXV D
AGENDA TITLE:	Consultant & Legal Counsel Reports; Receive, Approve and Authorize Transmittal of Fact Finding Reports, and receive report by Asst. Legal Counsel.

CONSENT [☐] ACTION [☒] INFORMATION [☒]

Staff Summary: It is anticipated that oral or written reports will be presented at the meeting by Technical Consultants Mr. Wardell and Mr. McWhorter and DCISC Assistant Legal Counsel Mr. Rathie concerning items listed or on other matters.

Fact finding reports may be submitted for consideration and comment by members and consultants since the last public meeting of the DCISC in October 2019. These reports may be received by the Committee, approved as to form and content and be authorized for transmittal to PG&E for its consideration and response. The Committee reserves the right to revise any fact-finding prior to the inclusion in an Annual Report. Fact finding reports in their final "as accepted form" become a part of the next DCISC Annual Report. Fact Finding Reports and are available for public inspection following their acceptance by the Committee at a public meeting.

RECOMMENDED COMMITTEE ACTION:

Receive reports by Consultants and Assistant Legal Counsel reports and provide direction.

Motions to accept Fact Finding Report concerning fact-findings conducted on July 22-23, November 6-7, December 10-11, 2019 and January 29-30, 2020.

DIABLO CANYON INDEPENDENT SAFETY COMMITTEE**AGENDA TRANSMITTAL FORM**

MEETING DATE:	February 12, 2020
AGENDA ITEM:	XVIII
AGENDA TITLE:	Committee Discussion and Receive Comments Regarding a Potential Role for the DCISC to Review Nuclear Fuel-Related Issues After Expiry of the Operating Licenses for DCPD.

CONSENT [☐] ACTION [☒] INFORMATION [☒]

Staff Summary: The Committee Members, Technical Consultants and Assistant Legal Counsel are expected to discuss and to receive comments from members of the public concerning amending the DCISC's Charter to provide for a role for the DCISC to review nuclear fuel-related issues after the cessation of electricity generation operations by DCPD including approving submission of an Application to the California Public Utilities Commission as well as the possible alternative presented by a proposed Settlement Agreement in the 2018 Nuclear Decommissioning Cost Triennial Proceeding now pending before the California Public Utilities Commission.

At the DCISC's public meeting on October 23-24, 2019 the Members discussed submitting an Application to the California Public Utilities Commission and recommended a version of a proposed Second Restatement of a Charter for the DCISC which would terminate the DCISC's safety review once all spent fuel was successfully transferred to the Diablo Canyon Independent Spent Fuel Storage Facility.

To inform this discussion, a copy of the draft Second Restatement (showing changes proposed from the Second Restatement approved at the October 2019 public meeting) is provided with this transmittal memo.

RECOMMENDED COMMITTEE ACTION: provide direction as appropriate.

TERMINATES REVIEW OF SAFETY OF OPERATIONS
UPON SUCCESSFUL TRANSFER OF ALL FUEL TO WITHIN THE
INDEPENDENT SPENT FUEL STORAGE INSTALLATION

**SECOND RESTATEMENT OF THE CHARTER FOR THE
DIABLO CANYON INDEPENDENT SAFETY COMMITTEE**

I. Formation and Membership of the Committee.

A. Composition and Responsibility of the Committee.

(1) An Independent Safety Committee (the "Committee") shall be established consisting of three members, one each appointed by the Governor of the State of California, the Attorney General and the Chair of the California Energy Commission ("CEC"), respectively, serving staggered three-year terms. The Committee shall review Diablo Canyon Nuclear Power Plant ("Diablo Canyon") operations for the purpose of assessing the safety of operations and suggesting any recommendations for safe operation and shall terminate its review in accordance with Section III. Safety of operations shall mean activities in connection with generation of electricity by Diablo Canyon and/or the operation of the Diablo Canyon Spent Fuel Pools and related support systems and the Diablo Canyon Independent Spent Fuel Storage Installation ("ISFSI"), including the transport of nuclear fuel to and from Diablo Canyon's Spent Fuel Pools and the storage of nuclear fuel within the Spent Fuel Pools and the transport and storage of nuclear fuel to and within the ISFSI or elsewhere at Diablo Canyon. Neither the Committee nor its members shall have any responsibility or authority for plant operations, and they shall have no authority to direct Pacific Gas & Electric Company ("PG&E") personnel. The Committee shall conform in all respects to applicable federal laws, regulations and Nuclear Regulatory Commission ("NRC") policies.

TERMINATES REVIEW OF SAFETY OF OPERATIONS
UPON SUCCESSFUL TRANSFER OF ALL FUEL TO WITHIN THE
INDEPENDENT SPENT FUEL STORAGE INSTALLATION

B. Appointment of Committee Members.

(1) Candidates for Committee membership shall be selected from those persons responding to an open request for applications. The California Public Utilities Commission ("CPUC") shall provide for public comment on qualified applicants by posting on the CPUC's homepage (www.cpuc.ca.gov) a link to information concerning the name of each qualified applicant, along with a summary of his or her qualifications and a statement identifying any potential conflict of interest, an Applicant's Application for Nomination shall address those items enumerated in Section I.C. The President of the CPUC shall provide to the appropriate appointing authority a list of not more than three qualified candidates as alternatives to the reappointment of that authority's designated Committee member whose term is expiring. The incumbent member, if he or she consents, shall be deemed an additional candidate. Each subsequent appointment shall be for a three-year term.

(2) Should a Committee member not complete the appointed term, the authority who appointed that member shall appoint a replacement to serve for the unexpired portion of the term from the most recent list of candidates selected by the President of the CPUC in accordance with the appointment procedures set forth herein (3) The President of the CPUC shall review each application to assess the applicant's qualifications, experience and background, including any conflict of interest and comment received from the public, and shall propose as candidates only persons with knowledge, background and experience in the field of nuclear power facilities and nuclear safety issues who demonstrate they have no conflict of interest as set forth in Section

TERMINATES REVIEW OF SAFETY OF OPERATIONS
UPON SUCCESSFUL TRANSFER OF ALL FUEL TO WITHIN THE
INDEPENDENT SPENT FUEL STORAGE INSTALLATION

I.C. The CPUC Energy Division shall prepare, circulate for public comment and place on the CPUC's public agenda a resolution ratifying the President's selection of not more than three qualified candidates and an incumbent member.

C. Conflict of Interest.

(1) No person shall serve as a member of the Committee if he or she has received \$500.00 or more in income (as defined in Government Code Section 82030, but excluding dividends or interest from stocks or bonds) or gifts (as defined in Government Code 82028) from PG&E or an affiliated company within twelve months prior to the start of his or her original term, or if he or she has, at the time of the commencement of service, an investment (as defined in Government Code Section 82034) worth \$2,000.00 or more in PG&E or any affiliated company. In addition, no member of the Committee shall make, participate in making, or in any way attempt to use his or her official position to influence any action of the Committee in which he or she knows or has reason to know that he or she has a financial interest. The provisions of the Political Reform Act, including implementing regulations and rulings, as applied to Government Code Section 87100 shall be used to determine whether a member has a conflict of interest.

(2) Members of the Committee shall file a Statement of Economic Interest at the same time and in the same manner as designated employees of the CPUC must file under the Political Reform Act and CPUC Conflict of Interest Code. Members of the Committee shall disclose any investment in or income from the following:

TERMINATES REVIEW OF SAFETY OF OPERATIONS
UPON SUCCESSFUL TRANSFER OF ALL FUEL TO WITHIN THE
INDEPENDENT SPENT FUEL STORAGE INSTALLATION

- (a) An electric corporation subject to the jurisdiction of the CPUC, including any parent, subsidiary or affiliated business entity;
- (b) A business entity that regularly supplies natural gas, nuclear fuel, fuel oil or other forms of energy to an electric corporation subject to CPUC jurisdiction;
- (c) Any business entity that has done more than \$10 million of work on the design, construction, engineering or operation of the Diablo Canyon power plant.

Copies of the members' Statements shall be available for public inspection.

(3) No person shall serve as a member of the Committee if he or she has a prior history of supporting or opposing PG&E as a witness or intervenor in nuclear licensing or CPUC proceedings associated with Diablo Canyon.

D. Commencement of Term.

(1) The list of candidates shall be submitted to the appointing authorities on or before January 1 of each year. Appointments shall be made by March 1 of each year. Each Safety Committee term shall commence on July 1 of the year of appointment. If any such deadline is missed, the relevant action shall be taken or shall occur at the earliest possible date thereafter.

(2) In accordance with Government Code Section 1302, a Committee member shall continue to discharge his or her duties until reappointed or replaced.

TERMINATES REVIEW OF SAFETY OF OPERATIONS
UPON SUCCESSFUL TRANSFER OF ALL FUEL TO WITHIN THE
INDEPENDENT SPENT FUEL STORAGE INSTALLATION

E. Exercise of Powers.

(1) The Chair of the CEC and the President of the CPUC shall exercise their powers after consultation with their respective commissions in public session.

II. Scope of Committee Operations.

A. Receipt of Reports and Records.

(1) The Committee shall have the right to receive on a regular basis such of the following operating reports and records of Diablo Canyon as the Committee may request. Such reports and records shall be provided quarterly as available:

- (a) Automatic scrams while critical;
- (b) Significant events;
- (c) Safety system actuations;
- (d) Forced outage rate;
- (e) Collective radiation exposure;
- (f) Industrial safety loss time accident rate;
- (g) NRC public reports and evaluations of Diablo Canyon; and
- (h) Such other reports pertinent to safety as may be produced in the course of operations and may be requested by the Committee.

B. Annual Site Inspection.

(1) The Committee shall have the right to conduct examinations of the Diablo Canyon site. If the Committee requires additional information regarding a specific issue the

TERMINATES REVIEW OF SAFETY OF OPERATIONS
UPON SUCCESSFUL TRANSFER OF ALL FUEL TO WITHIN THE
INDEPENDENT SPENT FUEL STORAGE INSTALLATION

Committee may request such information and, upon proper notice to PG&E, conduct a site visit to investigate that issue.

(2) PG&E shall cooperate with the Committee in arranging times for the Committee's visits to the site and shall be responsible for ensuring the cooperation of PG&E employees and contractors in providing information and access to the plant and facilities of PG&E and to pertinent records. Any such site visit must comply with all applicable federal laws, regulations and NRC policies, including laws, regulations and policies governing screening of persons who may participate in site inspections.

C. Committee Reports and Recommendations.

(1) The Committee shall prepare an annual report, and such interim reports as it deems appropriate, which reports shall include any recommendations of the Committee. The report shall be submitted first to PG&E, and PG&E shall respond in writing within 45 days. PG&E's response shall be made part of the report which shall then be submitted to the CPUC, the Governor, the Attorney General and the CEC. The CPUC, the Governor, the Attorney General and the CEC, or any one of them, may file a request pursuant to 10 CFR Sec. 2.206 for the Director of Nuclear Reactor Regulation to institute a proceeding to require PG&E to adopt any safety recommendation made by the Committee. PG&E is free to oppose any such recommendation before the NRC.

TERMINATES REVIEW OF SAFETY OF OPERATIONS
UPON SUCCESSFUL TRANSFER OF ALL FUEL TO WITHIN THE
INDEPENDENT SPENT FUEL STORAGE INSTALLATION

D. Confidentiality of Information

(1) In the course of review of Diablo Canyon operations, Committee members may receive confidential information. Federal law restricts disclosure of certain information; accordingly, Committee members shall seek approval of the NRC for access to such information and shall comply with all laws, regulations and policies applicable to access to, possession and use of such information. The Committee is subject to the California Public Records Act (Government Code Section 6250 et seq.). To the extent that PG&E believes that information sought by the Committee, not otherwise regulated by the Atomic Energy Act, is confidential under the California Public Records Act and/or constitutes confidential business information, the disclosure of which might injure PG&E in its business, PG&E shall so designate that information and the basis on which PG&E believes the information is exempt from disclosure. If the Committee receives a demand for disclosure of information so designated by PG&E the Committee shall notify PG&E and lawfully object and defend any rights the Committee may have to non-disclosure of the confidential information.. A dispute between the Committee and PG&E on a claim of confidentiality shall promptly be submitted to binding arbitration. Committee members and all persons who receive confidential information in the course of or as a result of the Committee's activities shall have a duty to maintain the confidentiality of that information and, in addition to complying with the requirements of federal and state law and regulations, shall execute a confidentiality agreement prior to receiving any confidential information.

TERMINATES REVIEW OF SAFETY OF OPERATIONS
UPON SUCCESSFUL TRANSFER OF ALL FUEL TO WITHIN THE
INDEPENDENT SPENT FUEL STORAGE INSTALLATION

(2) The Committee may contract for services, including the services of consultants and experts, to assist the Committee in its safety review. Disclosure of PG&E information or records to any such person shall be governed by the provisions of this agreement in the same manner as disclosure to members of the Committee. No disclosure of confidential information shall be made to any person who does not have a need to receive the information in order to assist the Committee in its safety review. Nor shall such disclosure be made to any person known to have a conflict of interest.

(3) This provision shall not preclude the Committee from submitting relevant information to the NRC or to the CPUC, the Governor, the Attorney General, or the CEC to the extent permitted by federal law. Prior to the disclosure of any confidential information, however, the Committee shall give PG&E notice of its intention to do so and an opportunity to designate specific documents or information which should not be publicly disclosed and to seek to prevent public disclosure by the entity to which disclosure is made.

E. Compensation of the Committee

(1) Members of the Committee shall be compensated in an amount established by the CPUC commensurate with fees PG&E pays for similar services. Each member shall receive a \$10,000.00 annual retainer and, in the event a member performs more than 40 hours of work on Committee business between July 1 and the following June 30, such hours shall be compensated at \$250.00 per hour. PG&E shall file annually, on April 1, a report updating commensurate fees

TERMINATES REVIEW OF SAFETY OF OPERATIONS
UPON SUCCESSFUL TRANSFER OF ALL FUEL TO WITHIN THE
INDEPENDENT SPENT FUEL STORAGE INSTALLATION

for comparable services and concurrent with that report, an advice letter with proposed revisions to the compensation levels.

(2) The fees and expenses of the Committee and its contractors shall be paid by PG&E and PG&E shall be entitled to recover those amounts through its cost-of-service rates. An authorized Committee budget not exceeding \$673,077.00 for calendar year 1996, with a 1.5% annual escalation for every year thereafter, has been established, which includes all costs, member compensation, travel expenses, contracting fees, staff salaries and audit expenses. Funds provided for the fees and expenses of the Committee and its contractors which remain unspent and uncommitted on December 31 of a calendar year will be returned to PG&E to be applied as a credit to its cost-of-service rates. The compensation of Committee members, which is included in the budget, is tied to the fees paid by PG&E for similar services. Therefore, the rate of change in the budget could differ from the rate of change in the compensation paid to committee members.

(3) The Committee and its contractors shall keep accurate books, records and accounts, which shall be open to inspection and audit by the CPUC or its designee and by PG&E. Such audit shall include review of the reasonableness of fees and expenses and review for conflict of interest.

F. Public Outreach

(1) The Committee shall undertake public outreach in the affected community, including, but not limited to, assuring that the Committee meetings are conducted in accordance

TERMINATES REVIEW OF SAFETY OF OPERATIONS
UPON SUCCESSFUL TRANSFER OF ALL FUEL TO WITHIN THE
INDEPENDENT SPENT FUEL STORAGE INSTALLATION

with the Bagley–Keene Open Meeting Act and videotaped and broadcast. To the extent that public outreach results in an increase in costs associated with the Committee, beyond any annual authorized funding level, the Committee's budget shall be increased by the same amount and PG&E shall be entitled to recover that amount through a CPUC-determined increment to PG&E's cost-of-service rates.

~~G.~~ Outreach to Other Reviewing Committees

(21) The Committee shall undertake outreach concerning matters within its purview with other review committees established by the CPUC (e.g., the Independent Peer Review Panel for Seismic Studies at Diablo Canyon Power Plant) and by PG&E (e.g., the Diablo Canyon Decommissioning Engagement Panel) including, but not limited to, providing advanced copies of its public meeting agendas and, upon request, copies of its non-confidential documents and reports.

III. Termination of Committee's Review of Diablo Canyon Operations.

(1) The Committee will terminate its review of safety of operation upon further order of the CPUC or upon the date of successful completion of the transfer of all nuclear fuel from both Diablo Canyon Spent Fuel Pools to the ISFSI. The Committee will then prepare and submit a final annual or an interim report and terminate its activities within twelve months ~~of that~~ after such order or date